## **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

#### **IN THE MATTER OF:**

ELECTRONIC APPLICATION OF LICKING)VALLEY RURAL ELECTRIC COOPERATIVE)CORPORATION FOR A GENERAL ADJUSTMENT)OF RATES PURSUANT TO STREAMLINED)PROCEDURE PILOT PROGRAM ESTABLISHED)IN CASE NO. 2018- 00407)

CASE NO. 2020-00338

# MOTION FOR EXTENSION OF TIME

Comes now Licking Valley Rural Electric Cooperative Corporation ("Licking Valley"), by and through counsel, and respectfully requests the Kentucky Public Service Commission ("Commission") grant an extension of time for 90 days from the deadline of May 10, 2024, until August 8, 2024, to file for a general adjustment of rates. In support of this motion, Licking Valley respectfully states as follows:

1. On May 10, 2021, the Commission issued an Order in this proceeding, stating that "Licking Valley RECC shall file a general adjustment of rates within three years of the date of service of this Order." The date to respond is scheduled as May 10, 2024.

2. In preparation for filing the rate case as ordered by the Commission, Licking Valley's financial review indicated that it should use the 2023 financial data for the test year to determine its cost-of-service study and rate design, and the numbers will not be finalized until the end of March, 2024.

3. As soon as its employees indicated that the financial data for 2023 would not be finalized until the annual report was due to the Commission by March 31, 2024, Licking Valley

referred to its consultants to determine the amount of time needed to perform a rate study, propose rates to be approved by the Board and give public notice in *Kentucky Living*, as the most economical method of giving notice. However, in order to have the customer notice published in the May 2024 edition of *Kentucky Living*, as would be required for a May 10, 2024 filing date, Licking Valley would have to have final rates determined for the customer notice and submitted to the staff at *Kentucky Living* by March 27, 2024.

4. Once the 2023 data is finalized, the information has to be provided to its cost-ofservice consultant to finalize the cost-of-service study, which will take approximately two months to complete. The results of the cost of service study and the corresponding draft rate revisions are then discussed with Licking Valley and its legal team and presented to Licking Valley's Board for final approval. These tasks cannot be completed in time for the deadline of March 27, 2024 for publication in the May 2024 edition of *Kentucky Living*. Publishing in *Kentucky Living* would allow Licking Valley to avoid the added costs associated with providing customer notice by the other approved means of providing customer notice.

5. Licking Valley is requesting the 90-day extension in order to allow Licking Valley time to compile its 2023 data so that 2023 can be used as the historic test period for the rate application. A 90-day extension will allow the cost-of-service study to be completed and presented to the Board for approval at its June board meeting. For an August 8, 2024 filing, Licking Valley would need to have final customer notice to *Kentucky Living* by June 28, 2024.

6. Licking Valley is diligently working to prepare the data required for the rate analysis. If the information is analyzed and the required notice, and rate proposal is prepared sooner than August 8, 2024, Licking Valley will file as soon as it is prepared.

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WHEREFORE, on the basis of the foregoing, Licking Valley respectfully requests that the Commission grant it an extension until August 8, 2024, to file for a general adjustment of rates pursuant to the Commission's May 10, 2021 Order.

Dated this 5<sup>th</sup> day of March, 2024.

Respectfully submitted,

uttam Han L. Allyson Honaker

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Counsel for Licking Valley RECC

# **CERTIFICATE OF SERVICE**

This is to certify that foregoing was submitted electronically to the Commission on March

5, 2024 and that there are no parties that have been excused from electronic filing. Pursuant to

prior Commission orders, no paper copies of this filing will be submitted.

Counsel for Licking Valley RECC