

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO ALLEGED	)	
VIOLATIONS OF KRS 278.160, 807 KAR 5:006,	)	
AND COMMISSION ORDERS BY SALT RIVER	)	
ELECTRIC COOPERATIVE CORP., SALT RIVER	)	Case No.
ELECTRIC COOPERATIVE CORP.'S BOARD OF	)	2020-00347
DIRECTORS: JIMMY LONGMIRE, CHAIRMAN;	)	
A.C. "HAPPY" CAHOE, VICE CHAIRMAN; LINDA	)	
WEST, SECRETARY; GAYLE TROUTMAN,	)	
TREASURER; DARRELL TINGLE, DIRECTOR;	)	
AND GARRY MANN, AND SALT RIVER ELECTRIC	)	
COOPERATIVE CORP.'S PRESIDENT AND	)	
CHIEF EXECUTIVE OFFICER, TIM SHARP	)	

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**MOTION FOR EXTENSION OF TIME,  
TO RESCHEDULE HEARING, AND FOR OTHER RELIEF**

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Comes now Salt River Electric Cooperative Corporation ("Salt River Electric"), by counsel, and with respect to the Order of the Commission initiating the above-styled proceeding entered yesterday, October 22, 2020 (the "Order"), hereby respectfully moves the Commission: (i) for an additional seven (7) days to comply with Ordering Paragraph 4, which presently requires a response before midnight tonight to alleged violations of Salt River Electric's tariff and the Commission's regulations and Orders; (ii) to reschedule the hearing currently scheduled for this upcoming Monday, October 26, 2020, to a date during the week immediately following (November 2 through November 6, excepting Election Day) and permitting remote attendance at the rescheduled hearing by certain parties, as necessary. In support of this motion, Salt River Electric respectfully states as follows:

Salt River Electric recognizes the seriousness of this matter and is committed to addressing the questions and concerns raised by the Commission. To that end, the cooperative has ceased all disconnections for nonpayment as directed by the Commission in Ordering Paragraph 9 of the Order. Further, to promote full cooperation and transparency, Salt River has taken the necessary steps today to reconnect each of the sixty-two (62) total delinquent accounts (all prepay customers) that it disconnected for nonpayment since the moratorium was lifted on October 20, 2020. Salt River Electric will not disconnect any of its accounts pending further orders of the Commission.

Salt River has retained counsel and is in the process of reviewing and responding to the Commission's Order. Because, as the Commission noted, the allegations in this matter could result in statutory penalties or other significant repercussions for the cooperative and its leadership,<sup>1</sup> additional time is necessary and appropriate to ensure a fair and accurate response may be provided. Moreover, and consistent with KRS 278.160, extending the period of time between the commencement of this matter and a hearing will allow Salt River Electric and its counsel an opportunity to adequately examine the relevant facts and law.<sup>2</sup> Finally, Salt River Electric requests that the Commission permit certain parties, particularly those at increased risk due to age and/or health issues, to attend the rescheduled hearing remotely. Salt River Electric believes each of these requests is reasonable and respectfully asks the Commission to grant this motion without delay.

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<sup>1</sup> See Order, a p. 7.

<sup>2</sup> KRS 278.260(2) ("The commission shall fix the time and place for each hearing held by it, and shall serve notice thereof upon the utility and the complainant not less than twenty (20) days before the time set for the hearing.").

This 23<sup>rd</sup> day of October, 2020.

Respectfully submitted,

**DINSMORE & SHOHL LLP**

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*Counsel to Salt River Electric*

**CERTIFICATION**

I hereby certify that the electronic version of this filing made with the Commission on October 23, 2020, is a true and accurate copy of the paper document that will be submitted to the Commission within 30 days of the Governor lifting the state of the emergency pursuant to the Commission's Orders in Case No. 2020-00085, and the electronic version of the filing has been transmitted to the Commission. A copy of this filing has been served electronically on all parties of record for whom an email address is given in the online Service List for this proceeding, and there are currently no parties that the Commission has excused from participation by electronic means.

/s/ Edward T. Depp  
*Counsel to Salt River Electric*