

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF</b>	)	
<b>NAVITAS KY NG, JOHNSON</b>	)	
<b>COUNTY GAS COMPANY, AND B&amp;H</b>	)	<b>CASE NO.</b>
<b>GAS SYSTEM FOR APPROVAL OF</b>	)	<b>2020-00396</b>
<b>ACQUISITION, TRANSFER OF</b>	)	
<b>OWNERSHIP, AND CONTROL OF</b>	)	
<b>NATURAL GAS UTILITY SYSTEMS</b>	)	

**NAVITAS KY NG, LLC, JOHNSON COUNTY GAS COMPANY, AND B&H GAS**  
**SYSTEM MOTION REQUESTING AN EXTENSION OF TIME**

COMES NOW Navitas KY NG, LLC ("Navitas"), Johnson County Gas Company ("JCG"), and B&H Gas System ("B&H"), by and through undersigned counsel, and hereby submit this Motion Requesting an Extension of Time (an additional 10 days) to submit a response to the Commission's request for additional documentation pursuant to the Commission's First Request for Information, entered January 21, 2021.

In support of this Motion, Navitas would show unto the Commission as follows:

1. The Commission has jurisdiction over this matter pursuant to KRS 278.010 et seq., 807 KAR 5:076 et seq.
2. The Commission issued its Request for Information in 2020-00396 on January 21, 2021, which Navitas, B&H and JCG were to produce within 8 days. The Data Request was made up of twenty-five data requests, some containing several subsections of additional questions.

3. The parties are prepared to submit responses to the Data Requests for several of the numbered requests by the deadline of January 29, 2021, but will require additional time to supplement these responses for the following numbered requests:

- Question 6 (c), including the requested Excel Spreadsheet report of the JCG rates applied to all customers of JCG & B&H.
- Question 8 (b) including the requested Excel Spreadsheet report for 8 (b).
- Question 11 (a). Navitas would like to file this entire document confidentially to protect the work product. Navitas has an agreement with its creator to not publish their product online. Should the Commission not permit confidential treatment to the entire document, Navitas requests that in the alternative, the Commission allow Navitas to mail a hard copy for review.

**WHEREFORE**, Navitas KY NG, LLC, B&H Gas, and JCG respectfully request the Commission to issue an Order:

1. Approving the parties' request for a 10 day extension of time to Friday, February 12, 2021 to enable Navitas, B&H and JCG to satisfactorily complete the Data Request issued in the Commission's January 21, 2021 Order; and

2. Granting such other relief as the Commission may determine to be fair, just and equitable in the premises.

Dated this the 29th day of January, 2021.

Respectfully submitted,

/s/ Klint W. Alexander

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/s/ Joe F. Childers

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 29th day of January, 2021, a true and correct copy of the foregoing instrument was deposited in the United States Mail with postage prepaid, and addressed to the following:

**Lindsey Flora**

Executive Director  
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/s/ Klint W. Alexander

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/s/ Joe F. Childers

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