

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	
CLAUSE OF BIG RIVERS ELECTRIC)	CASE NO.
CORPORATION COOPERATIVES FROM)	2021-00060
NOVEMBER 1, 2018 THROUGH OCTOBER 31,)	
2020)	

**NOTICE OF LIMITED ENTRY OF APPEARANCE ON BEHALF OF
JACKSON PURCHASE ENERGY CORPORATION AND JACKSON
PURCHASE ENERGY CORPORATION'S MOTION FOR EXTENSION
OF TIME**

Comes Mark D. Goss, Goss Samford, PLLC ("Counsel"), and does hereby enter his limited appearance on behalf of Jackson Purchase Energy Corporation ("JPEC"), for the sole purpose of filing this Motion for Extension of Time. Upon completing the filing of this motion, Counsel does not intend to participate in any further proceedings in this case on behalf of JPEC.

Further, comes JPEC, by and through counsel, and moves the Commission for entry of an order extending the deadline for it to file responses to the Commission Staff's data requests provided in the Commission's March 4, 2021, Order, by ten days, or until April 15, 2021. In support of this motion JPEC states the following:

1. By Commission Order dated March 4, 2021, the Commission Staff propounded data

requests to JPEC and Big Rivers' Electric Corporation's other owner-members, Meade County Rural Electric Cooperative Corporation and Kenergy Corporation. Responses from all three distribution cooperatives are due no later than April 5, 2021;

2. The responsibility for compiling the two-years' worth of data, organizing it and providing substantive responses to the Commission Staff's data requests belongs to JPEC's Chief Financial Officer—Vice President of Finance and Accounting, Jeff Williams. Mr. Williams' mother deceased on March 24, 2021, and because of the need to attend to personal family business, including funeral arrangements, he was to be out of the office until March 30, 2021. However, before he could return to work a member of Mr. Williams' immediate family tested positive for the COVID-19 virus requiring Mr. Williams to remain in quarantine status at home until at least April 9, 2021, and possibly longer. Once Mr. Williams returns to work he estimates that it will take approximately three working days to compile the necessary data and make formal responses on JPEC's behalf to the Commission's data requests.

3. During his period of quarantine Mr. Williams will be working from home, however, all of the relevant data resides at his JPEC office and he must compile and prepare the responses there.

4. Because of the above facts JPEC respectfully requests an extension of time until April 15, 2021, to file its responses to the Commission's data requests. The requested extension should not cause hardship to the parties or undue delay to administration of the case since the hearing is currently scheduled for May 18, 2021, more than one month following the date of the extension requested by JPEC. In addition, on March 9, 2021, JPEC, by and through Mr. Williams filed its affidavit acknowledging compliance with each and every provision of the uniform

adjustment clause, as prescribed in 807 KAR 5:056, for the two-year review period, November 1, 2018 to October 31, 2020.

WHEREFORE, Jackson Purchase Energy Corporation respectfully requests that the Commission accept Counsel's limited entry of appearance for purposes of filing this motion; and, further, enter an order granting an extension until April 15, 2021, for the filing of JPEC's responses to the Commission Staff's data requests.

This 2nd day of April, 2021.

Respectfully Submitted,

Mark David Goss

Mark D. Goss
David S. Samford
L. Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Rd., Ste. B-325
Lexington, KY 40504
Tel. (859) 368-7740
mdgoss@gosssamfordlaw.com
david@gosssamfordlaw.com
allyson@gosssamfordlaw.com

Counsel for JPEC

CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on April 2, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium will be delivered to the Commission within thirty (30) days of the conclusion of the present COVID-19 related state of emergency.

Mark David Goss

Counsel for JPEC