

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DELTA)	
NATURAL GAS COMPANY, INC. FOR AN)	
ADJUSTMENT OF ITS RATES AND A)	
CERTIFICATE OF PUBLIC)	CASE NO. 2021-00185
CONVENIENCE AND NECESSITY)	

MOTION FOR EXTENSION OF TIME

Delta Natural Gas Company, Inc. (“Delta” or the “Company”) moves for an extension of time up to and including August 13, 2021 in which to file certain responses to the Commission Staff’s Second Request for Information (“Commission Staff’s Request”) and the Initial Data Requests of the Attorney General (“AG’s Request”). In support of this Motion, Delta states:

1. On June 16, 2021, the Commission issued a procedural schedule in this case requiring Delta file responses to initial requests for information no later than July 28, 2021. Delta has been diligently working on responding to the Commission Staff’s Request and the AG’s Request since it received the requests on July 12, 2021 and July 14, 2021, respectively. After it received the requests, Delta requested assistance from its ROE expert, Paul Moul, to answer certain questions related to ROE or Mr. Moul’s direct testimony.

2. Good cause exists for an extension of time to respond to portions of the Commission Staff’s Request and the AG’s Request. On July 20, 2021, Delta learned that Mr. Moul had a serious bicycle accident that prohibits him from completing the responses by July 28, 2021.

3. Due to Mr. Moul’s accident, Delta is engaging Dylan D’Ascendis to adopt Mr. Moul’s testimony and respond to the following ROE questions: PSC 2-20, PSC 2-21, PSC 2-23,

PSC 2-25, PSC 2-26, PSC 2-29, PSC 2-30, PSC 2-31, PSC 2-32, PSC 2-33, PSC 2-34, PSC 2-35, PSC 2-36, PSC 2-37, AG 1-9, AG 1-10, AG 1-11, and AG 1-12 (“Moul Responses”).

4. Undersigned counsel spoke with the Commission Staff attorney and the Attorney General attorney working on this case regarding the need to request an extension of time for Delta to file the Moul Responses with the Commission.

5. Delta requests an extension of time up to and including August 13, 2021 to file the Moul Responses to provide Mr. D’Ascendis the opportunity to respond to same. This will also allow Commission Staff and the Attorney General to review the responses before supplemental requests for information are due to Delta on August 18, 2021.

WHEREFORE, Delta Natural Gas Company, Inc. respectfully requests the Kentucky Public Service Commission grant an extension of time up to and including August 13, 2021 to file the Moul Responses described herein.

Dated: July 27, 2021

Respectfully submitted,



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CERTIFICATE OF COMPLIANCE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on July 27, 2021; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.


