

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 September 13, 2021 in which to file a response to Question No. 29 of the Commission Staff’s Third Request for Information (“Commission Staff’s Request”). In support of this Motion, Delta states:

1. On June 16, 2021, the Commission issued a procedural schedule in this case. The Commission modified the procedural schedule by order dated August 6, 2021, requiring Delta file responses to supplemental requests for information no later than September 8, 2021. Delta has been diligently working on responding to the Commission Staff’s Request and the Attorney General’s Supplemental Data Request since it received the requests on August 24, 2021 and August 25, 2021, respectively.

2. Good cause exists for an extension of time to respond to Question No. 29 of Commission Staff’s Request. Question No. 29 requests Delta perform a lead/lag study to determine the amount of cash working capital that would be included in rate base for the base and forecasted periods. Performing the lead/lag study requires significant original work. Since receiving this request, Delta and its expert witness Mr. Seelye have been working on the lead/lag

study. Given the number of inputs and amount of original work required to perform the lead/lag study, Delta and Mr. Seelye are not able to complete the study by September 8, 2021.

3. Delta requests an extension of time up to and including September 13, 2021 to file the response to Commission Staff Request Question No. 29. This extension will not result in any undue delay or burden and will allow the Attorney General time to review the response before intervenor testimony is due on September 27, 2021.

WHEREFORE, Delta Natural Gas Company, Inc. respectfully requests the Kentucky Public Service Commission grant an extension of time up to and including September 13, 2021 to file the lead/lag study requested in Question No. 29 of the Commission Staff's Third Request for Information.

Dated: September 7, 2021

Respectfully submitted,

Monica H. Braun

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Inc.

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 September 7, 2021; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

Monica H. Braun
