

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

In the Matter of:

ELECTRONIC TARIFF FILING OF NATURAL GAS )	
SERVICES, LLC FOR INITIAL RULES, )	CASE NO.
REGULATIONS AND RATES FOR FURNISHING )	2021-00390
GAS SERVICE PURSUANT TO KRS 278.485 )	

**MOTION FOR LEAVE TO FILE RESPONSES TO  
COMMISSION STAFF’S THIRD REQUEST FOR INFORMATION OUT OF TIME**

Natural Gas Services, LLC (Natural Gas Services) moves for leave to file the previously filed “Response to Commission Staff’s Third Request for Information” and the attached supplementary information out of time. In support of its motion, Natural Gas Services states:

1. On October 11, 2021, Natural Gas Service filed to the Public Service Commission (“Commission”) a tariff to establish initial rates, rules, and regulations pursuant to KRS 278.485 and 807 KAR 5:026, which govern gathering systems that provide service to retail customers who tap onto farm tap systems.
2. On January 19, 2022, Commission Staff submitted to Natural Gas Services its Third Request for Information, pursuant to 807 KAR 5:001, with information requested due on February 1, 2022.
3. The undersigned had planned to have its Third Response electronically filed in timely fashion, but due to technical problems, was unable to do so before close of business on February 1, successfully filing on February 2, 2022 at approximately 1:50 AM.
4. While the Third Response was filed after midnight on February 1, it was still filed before normal business hours would commence on February 2. As such, that the Commission experienced no actual prejudice in receiving this information after the close of business on February 1.
5. Additionally, Request #8 requested “the lease agreements for the 78 customers with free gas” but if “the lease agreements are the same for all 78 customers, then only provide a single copy.” Client was unable to produce this document prior to the time of filing as a result of obligations in an unrelated legal matter. However, the requested lease is now provided as part of this filing.

**WHEREFORE**, Natural Gas Services, LLC, respectfully moves the Commission to grant this Motion seeking leave to file its Responses to the Commission's Third Request for Information after the February 1 deadline.

Dated this 2<sup>nd</sup> of February 2021.

Respectfully submitted,



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