

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

2022 INTEGRATED RESOURCE PLAN OF ) Case No.  
EAST KENTUCKY POWER COOPERATIVE, INC. ) 2022-00098

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EAST KENTUCKY POWER COOPERATIVE, INC.'S  
MOTION FOR AN ENLARGEMENT OF TIME TO  
TENDER RESPONSES TO INFORMATION REQUESTS

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Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by counsel, and does hereby respectfully move the Commission to enlarge the period of time in which to file responses to information requests from the Commission and intervenors, respectfully stating as follows:

EKPC tendered its 2021 Integrated Resource Plan (“IRP”) to the Commission on April 1, 2022. The IRP is a triennial snapshot of EKPC’s existing status and plans. The filing of an IRP involves review by the Commission and intervenors, a hearing and the issuance of a staff report. As part of the review phase of the case, the Commission and intervenors typically propound multiple rounds of information requests to EKPC. This case is no exception. The Commission has granted motions for leave to intervene filed by the Office of the Attorney General, Kentucky Industrial Utility Customers, Inc., the Sierra Club, the Mountain Association, the Kentucky Solar Energy Society and Kentuckians for the Commonwealth. The initial information requests propounded by Commission Staff and the aforementioned intervenors include several hundred specific and unique requests for information.

EKPC has been diligent in seeking to gather the information requested by the Commission and the intervenors, however, the time allotted by the June 1, 2022 procedural schedule is proving

to be insufficient. Accordingly, EKPC contacted counsel for each of the intervenors earlier this week to inquire as to whether they would be agreeable to a brief extension of time in which to file EKPC's responses. Each of the intervenors was agreeable to EKPC's request provided that the subsequent case deadlines were similarly extended and the hearing date of December 13, 2022 did not change. EKPC believes that this is reasonable. Accordingly, EKPC respectfully requests that its deadline for tendering response to the initial data requests filed by the Commission and intervenors on or about June 30, 2022 should be extended from July 21, 2022 to July 29, 2022. EKPC similarly respectfully requests that each of the following deadlines also be similarly extended so that no party is prejudiced. EKPC does not request any changes to the hearing currently scheduled for December 13, 2022.

WHEREFORE, on the basis of the foregoing, EKPC respectfully requests an enlargement of the period of time in which to file responses to information requests from the Commission and intervenors and for the corresponding adjustment of subsequent case deadlines, excluding the date currently set for the hearing in this matter.

This 14<sup>th</sup> day of July, 2022.

Respectfully submitted,



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*Counsel for East Kentucky Power Cooperative, Inc.*

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the attached filing was served via the Commission's electronic filing system on this 14<sup>th</sup> day of July 2022, that no parties have been excused from electronic service and that pursuant to the Commission's Orders in Case No. 2020-00085, no paper copy of this filing shall be delivered to the Commission.

A handwritten signature in black ink, appearing to read "D. L. S. J.", written in a cursive style.

*Counsel for East Kentucky Power Cooperative, Inc.*