COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC TARIFF FILING OF HAY)	
EXPLORATION, INC. FOR INITIAL RULES,)	CASE NO.
REGULATIONS, AND RATES FOR FURNISHING)	2023-00152
GAS SERVICE PURSUANT TO KRS 278.485)	

MOTION FOR EXTENSION OF TIME TO RESPOND TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION

Hay Exploration, Inc. ("Hay Exploration") hereby moves for an extension of time by which to respond to certain requests in Staff's Second Request for Information. In support of this Motion, Hay Exploration states that it has worked diligently to provide answers to the Requests. However, it has limited employees and all of those with the ability to respond to these inquiries also work in the field, which has impacted its ability to gather information. Additionally, certain requests, including Requests 18, 21 and 29 require either clarification or the production of a substantial volume of records maintained by the Division of Oil and Gas. Hay Exploration believes that the responses are now substantially complete and will supplement with additional data when available. Accordingly, Hay Exploration respectfully requests that the Commission permit the filing of these responses as of the date of this Motion.

Respectfully Submitted,

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Counsel for Hay Exploration, Inc

CERTIFICATE OF SERVICE

This is to certify that foregoing electronic filing was transmitted to the Commission on August 9, 2023; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of the filing will be made.

Counsel for Hay Exploration, Inc.

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