## **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC TARIFF FILING OF EAST KENTUCKY POWER COOPERATIVE, INC., AND ITS MEMBER DISTRIBUTION COOPERATIVES FOR APPROVAL OF PROPOSED CHANGES TO THEIR QUALIFIED COGENERATION AND SMALL POWER PRODUCTION FACILITIES TARIFFS

CASE NO. 2023-00153

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## **MOTION FOR EXTENSION OF TIME**

Come now East Kentucky Power Cooperative, Inc., ("EKPC"), and its sixteen Owner-Members by and through counsel, and respectfully requests the Kentucky Public Service Commission ("Commission") to grant an extension of time to file their revised tariffs in the abovestyled case, until twenty days after a decision on East Kentucky Power's Motion for Rehearing is entered. In support of this motion, EKPC and its Owner-Members respectfully state as follows:

1. On October 31, 2023, the Commission issued an Order denying EKPC's proposed rates and setting forth approved rates in the Appendix to that Order.

2. The Commission's October 31, 2023 Order gave EKPC and its Owner-Members twenty days to file updated tariffs containing the Commission approved rates from the Appendix to the Order.

3. On November 20, 2023, EKPC filed a Motion for Rehearing on the Commission's October 31, 2023 Order.

4. If EKPC is successful on any of its issues raised in its November 20, 2023 Motion for Rehearing, EKPC's and therefore its Owner-Members approved rates will change from the amounts contained in the Appendix to the Commission's October 31, 2023 Order.

5. EKPC and its Owner-Members would rather not put rates into effect that may change a short time later when an Order is issued on its Motion for Rehearing. EKPC and its Owner-Members believe that putting the approved rates from the Appendix into effect now, and possibly having EKPC's Motion for Rehearing granted, which will again change the approved rates, will cause confusion for the members and cause unreasonable administrative expense.

6. EKPC and its Owner-Members request that the Commission grant an extension of time for EKPC and its Owner-Members to file updated tariff sheets until twenty days after the Commission issues a decision on EKPC's Motion for Rehearing.

WHEREFORE, on the basis of the foregoing, EKPC and its Owner-Members respectfully request that the Commission grant it an extension, until twenty days after the Commission enters a decision on EKPC's Motion for Rehearing, to file updated tariffs in this proceeding.

Dated this 20<sup>th</sup> day of November, 2023.

Respectfully submitted,

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Counsel for East Kentucky Power Cooperative, Inc.

## **CERTIFICATE OF SERVICE**

This is to certify that foregoing was submitted electronically to the Commission on November 20, 2023 and that there are no parties that have been excused from electronic filing. Pursuant to prior Commission orders, no paper copies of this filing will be submitted.

Counsel for East Kentucky Power Cooperative, Inc.