

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Electronic Application of Pennyriple Regional)	
Energy Agency for a Declaratory Order)	Case No. 2023-00195
Regarding the Jurisdiction of the Public)	
Service Commission)	

MOTION FOR EXTENSION OF TIME

The Pennyriple Regional Energy Agency (“PREA”), by counsel, respectfully moves the Public Service Commission (“Commission”) for an order extending the time by which PREA files a Reply to Atmos Energy Corporation’s (“Atmos Energy”) Response filed on November 2, 2023.

In support of this motion, PREA states as follows:

PREA filed a Application for Declaratory Order on June 19, 2023. Atmos Energy thereafter moved to intervene in the case. In the Commission’s order denying intervention, it authorized Atmos Energy to file a Response brief.

Pursuant to Section 19(5) of 807 KAR 5:001, replies to such a response shall be filed within fourteen days after service of the response, which would include Thanksgiving holiday weekend. Subpart 8 of that regulatory section also explicitly authorizes the Commission to extend the time for filing of a reply.

PREA respectfully requests a fourteen-day extension by which to submit a reply brief. This motion is primarily driven by the workload of counsel, who will require additional time to adequately address the arguments presented by Atmos Energy. PREA submits there is good cause to grant such an extension for several reasons including (1) the Commission does not have a statutory deadline by which to issue an order in this matter, (2) an additional two weeks will not

detrimentally affect any party to this action, particularly in light of the fact that there were four and a half months between the filing of the application and the filing of Atmos's substantive response, and (3) the additional time will enable PREA to present a more thorough reply, which will ultimately assist the Commission in making its decision. The Commission has previously granted extensions due to workload considerations.¹

Accordingly, PREA respectfully requests an extension through November 30, 2023, by which to file a reply to Atmos Energy's response.

Respectfully Submitted,

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AND MOLONEY, PLLC

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¹ See, e.g., *Kentucky Utils. Co.*, Case No. 2015-00221 (Ky. PSC Aug. 5, 2015)(granting an extension requested as a result of utility employee's existing workload and vacation schedules; see also *In re 2017 Integrated Resource Plan of Big Rivers Elec. Corp.*, Case No. 2017-00384 (Ky. PSC Nov. 9, 2017)(ordering an extension to accommodate Commission Staff's employee levels and workloads).