

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENERGY CORP.) Case No.
FOR A GENERAL ADJUSTMENT OF RATES) 2023-00276

**KENERGY CORP.'S MOTION FOR VIRTUAL INFORMAL CONFERENCE AND
EXTENSION ON DEADLINE FOR DATA REQUEST RESPONSE**

Kenergy Corp. (Kenergy), by counsel, hereby respectfully moves for the Commission to schedule a virtual informal conference and grant an extension on Kenergy's response to Commission Staff's Third Rehearing Data Request. In support thereof, Kenergy states as follows.

On August 19, 2024, following the Commission's final order herein, Kenergy filed a verified petition for rehearing on the limited issue of proposed changes to its Schedule 165 to comply with the Commission's order. On September 5, 2024, the Commission granted the request. Thereafter, the Commission propounded two separate data requests to Kenergy, and Kenergy submitted verified responses to each request. The requests and responses pertained, in part, to the functionality of Kenergy's billing software. Kenergy and counsel for the Attorney General's Office both submitted requests to submit the matter for a decision on the record. On November 12, 2024, Commission Staff delivered to Kenergy its third rehearing data request, in part seeking further explanation about the billing software.

Given the nature of trying to ask about and describe technical software functions, Kenergy respectfully submits that it will be beneficial to all parties to address the Commission's remaining concerns through a live discussion. An informal conference would be the most effective way to ensure Kenergy can understand and directly address the Commission's remaining concerns.

The undersigned counsel has spoken with Assistant Attorney General Larry Cook regarding the possibility of scheduling an informal conference on the issue and does not anticipate there will be an objection to an informal conference.

Additionally, Kenergy respectfully requests an extension on the deadline for its response to the third data request to allow time for the informal conference. The current due date is November 22, 2024, and it seems unlikely that the informal conference will be held before that date. If the informal conference does not resolve the matter, Kenergy could file its response to the third data request within ten (10) days after the conference.

WHEREFORE, in light of the foregoing, Kenergy respectfully requests the Commission (1) schedule a virtual informal conference for the purpose of addressing the proposed changes to Schedule 165, and (2) extend the deadline for Kenergy's responses to the Commission Staff's Third Rehearing Data Request until ten (10) days after the conclusion of the informal conference.

Respectfully Submitted,

/s/ Nicholas D. Kafer
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Certification

I hereby certify that the foregoing electronic filing was transmitted to the Kentucky Public Service Commission for filing on November 13, 2024; there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and by virtue of the Commission's Order of 2020-00085, no paper copies of this filing will be made.

/s/ Nicholas D. Kafer
Counsel for Kenergy Corp.