

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY AND LOUISVILLE GAS)	
AND ELECTRIC COMPANY FOR A SITE)	CASE NO.
COMPATIBILITY CERTIFICATE FOR THE)	2023-00361
CONSTRUCTION OF A SOLAR FACILITY IN)	
MERCER COUNTY, KENTUCKY)	

MOTION FOR EXTENSION OF TIME

Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU”) (collectively the “Companies”) respectfully move the Commission for an extension of time to provide responses to Commission Staff’s April 23, 2024 Second Request for Information. The deadline in the Second Request for Information is May 3, 2024. The Companies hereby request an additional week to provide responses so that the responses would be due on May 10, 2024. In support of this Motion, the Companies state as follows:

1. On November 13, 2023, the Companies filed their Joint Application and supporting documentation in this matter. By Order dated December 5, 2023, the Commission issued a procedural schedule setting only the following deadlines: December 11, 2023 for intervention requests; January 5, 2024 for initial requests for information to the Companies; January 19, 2024 for the Companies’ responses to those initial requests; and January 24, 2024 for the parties to request a public hearing or to indicate that matter could be decided based upon the written record.

2. No intervention requests were filed and thus there are no intervenors in this matter. Commission Staff issued its First Information Request (consisting of 21 data requests) on January 3, 2024 and the Companies filed their timely responses to that request on January

19, 2024. Next, on January 24, 2024, the Companies filed their timely statement indicating that the matter could be decided based upon the written record. With that filing and based upon the procedural schedule, the Companies assumed a decision would be issued. However, on April 23, 2024, Commission Staff issued its Second Request for Information consisting of 34 data requests.

3. Although the December 5, 2023 procedural schedule did not specifically contemplate a second information request, it did contain the Commission's customary language that "extensions of time with respect to the procedural schedule herein shall be made in writing and will be granted only upon a showing of good cause,"¹ the Companies recognize and agree that good cause must be shown for extensions of time.

4. Commission Staff's April 23, 2024 Second Request for Information seeks extensive and detailed information regarding, among other things: Mercer County Planning and Zoning requirements and legal issues related to those requirements; the effect on the project at issue in this case if certain setback requirements are imposed; maps showing distances from the proposed structures and facilities to property boundaries and adjoining property owners; roadway weight limits for nearby roads and bridges; anticipated equipment delivery routes; maps for vegetative screening; and pile driving timing limitations. While all fair and reasonable questions, some of this information is time-consuming to obtain and has required the Companies to engage third-party consultants to develop the requested information. The Companies therefore need additional time to compile the requested information, confirm its accuracy, and then properly file it with the Commission to ensure that the Companies' responses will be as thorough and accurate as possible.

¹ December 5, 2023 Order, p.4.

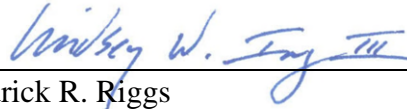
5. As there are no intervenors (there has likewise been no public comment in this matter), a short one-week extension to file responses would have no effect on any other party's schedule or on the processing of this case. Under similar circumstances, the Commission granted a two-week extension of time in Case No. 2023-00220 indicating that the party in that case had established good cause.² The Companies respectfully submit that good cause exists for the requested one-week extension until May 10, 2024.

WHEREFORE, the Companies respectfully request the Commission to issue an Order granting the Companies until May 10, 2024 to file their responses to Commission Staff's Second Request for Information.

² Case No. 2023-00220, *Electronic Application of East Casey County Water District for a Rate Adjustment Pursuant to 807 KAR 5:076* (Ky. PSC Oct. 6, 2023).

Dated: April 30, 2024

Respectfully submitted,



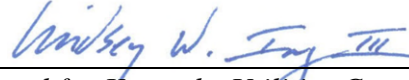
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CERTIFICATE OF COMPLIANCE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on April 30, 2024; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



*Counsel for Kentucky Utilities Company and
Louisville Gas and Electric Company*