COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION)	
OF SOUTH KENTUCKY RURAL)	CASE NO.
ELECTRIC COOPERATIVE)	2024-00402
CORPORATIONFOR A GENERAL)	
ADJUSTMENT OF RATES)	

MOTION TO AMEND PROCEDURAL SCHEDULE

Comes now South Kentucky Rural Electric Cooperative Corporation ("South Kentucky"), by counsel, and respectfully moves the Kentucky Public Service Commission ("Commission") to amend the procedural schedule. In support of this request, South Kentucky states as follows:

- 1. On January 3, 2025, South Kentucky filed its Notice of Intent to file a general adjustment of rates and filed its Application on February 3, 2025. On February 19, 2025, the Commission issued an order suspending South Kentucky's proposed rates until August 5, 2025, and setting forth a procedural schedule for the processing of this matter.
- 2. On March 14, 2025, Commission Staff and the Attorney General, by and through the Office of Rate Intervention ("Attorney General") issued requests for information to South Kentucky. The responses are due on March 28, 2024.
- 3. South Kentucky has been working diligently to respond to the requests and compile the data required to thoroughly respond to all of the requests. However, South Kentucky has only one employee that has the ability to compile the data required to respond to the requests from Commission Staff and the Attorney General.

- 4. South Kentucky has been able to gather all of the data and is working on finalizing the responses to the Commission Staff's Second Request for Information ("Staff's Second Request") and believes it will file the responses to Staff's Second Request on March 28, 2025, as directed in the February 13, 2025 Order.
- 5. However, the Attorney General's First Request for Information ("Attorney General's First Request") contains 350 requests (including subparts) for which South Kentucky must provide a response. Many of the requests require South Kentucky to review multiple years of data to generate the response requested by the Attorney General.
- 6. South Kentucky is requesting the Commission amend the procedural schedule to allow two additional weeks to respond to the Attorney General's First Request and subsequently adjust the remaining procedural dates by two weeks. This will allow South Kentucky to thoroughly review the data the Attorney General is requesting and provide a complete response to each of the 350 requests.
- 7. South Kentucky understands the Commission does not look favorably upon motions to amend procedural schedules. South Kentucky believes amending the procedural schedule by two weeks will not prejudice the Commission or the Attorney General. South Kentucky is requesting the Commission allow ample time to respond to the 350 requests for information in an adequate timeframe so that all of the information is correct and responsive, to the best of South Kentucky's ability, to the requests the Attorney General has made.

WHEREFORE, on the basis of the foregoing, South Kentucky respectfully requests that the Commission amend the procedural schedule to allow two additional weeks for South Kentucky to respond to the Attorney General's First Request and subsequently adjust the additional dates in the procedural schedule.

This the 27th day of March, 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that the electronic filing was transmitted to the Commission on March 27, 2025, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 no paper copies of this filing will be made.

Heather S. Temple

Counsel for South Kentucky Rural Electric Cooperative Corporation