

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**ELECTRONIC APPLICATION OF NAVITAS KY)
NG, LLC FOR AN ALTERNATIVE FILING) CASE NO. 2025-00332
PURSUANT TO 807 KAR 5:076)**

**MOTION FOR LEAVE TO LATE-FILE RESPONSES TO
POST-HEARING REQUEST FOR INFORMATION**

Navitas KY NG, LLC (“Navitas”), by counsel, hereby moves the Kentucky Public Service Commission (“Commission”) for leave to late-file certain of its responses to Commission Staff’s Post-Hearing Requests for Information propounded December 8, 2025. In support of this request, Navitas states as follows:

1. On December 5, 2025, a formal hearing was held to take evidence in connection with Navitas’s request for emergency interim rate relief during the pendency of this matter.
2. On December 8, 2025, Commission Staff issued Post-Hearing Requests for Information. Navitas was required to file responses on or before December 12, 2025.
3. After receiving the Post-Hearing Requests for Information, Navitas immediately began work to retrieve and compile all requested information and materials.
4. On December 12, 2025, Navitas submitted complete responses to nearly all of the Post-Hearing Requests for Information; however, despite diligent efforts, Navitas was unable to provide complete responses to all twenty-nine (29) requests by the deadline due to time constraints.
5. During the emergency hearing on December 5, 2025, the Commission acknowledged the short turnaround for responding to Commission Staff’s Post-Hearing Request for Information and indicated that if Navitas were unable to provide responses by the deadline,

then Navitas may supplement its responses as needed after December 12, 2025.¹ Contemporaneously with this Motion, Navitas is supplementing its filing made on December 12, 2025, with responses to the remaining requests for information.

6. To the extent necessary, Navitas respectfully requests that the Commission grant it leave to late-file the supplemental responses. This relief is warranted based on good cause shown.

This the 17th day of December, 2025.

Respectfully submitted,

/s/ M. Evan Buckley

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¹ Case No. 2025-00332, December 5, 2025 Hearing Video, Commission Chair Hatton, at 11:28:11 AM (<https://www.youtube.com/watch?v=dcMBItHIU6U>).

Certification

I hereby certify that a copy of this filing has been served electronically on all parties of record through the use of the Commission's electronic filing system, and there are currently no parties that the Commission has excused from participation by electronic means. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, a paper copy of this filing has not been transmitted to the Commission.

/s/ M. Evan Buckley
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