

**Goss
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October 19, 2016

VIA HAND DELIVERY

Dr. Talina Mathews, Ph.D.
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

RECEIVED
OCT 19 2016
PUBLIC SERVICE
COMMISSION

Re: PSC Case No. 2016-00335

Dear Dr. Mathews:

Enclosed, please find for filing with the Commission in the above-referenced case an original and ten copies of a Motion for an Extension of Time.

Please return a file-stamped copy of this filing to my office.

Very truly yours,

David S. Samford
David S. Samford *by MEB*

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 19 2016

In the Matter of:

PUBLIC SERVICE
COMMISSION

**AN EXAMINATION BY THE PUBLIC SERVICE)
COMMISSION OF THE ENVIRONMENTAL)
SURCHARGE MECHANISM OF EAST KENTUCKY)
POWER COOPERATIVE, INC. FOR THE SIX-)
MONTH BILLING PERIODS ENDING JUNE 30,)
2016 AND THE PASS THROUGH MECHANISM)
FOR ITS SIXTEEN MEMBER DISTRIBUTION)
COOPERATIVES)**

**CASE NO.
2016-00335**

MOTION FOR AN EXTENSION OF TIME

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by counsel, and, for itself on behalf of its sixteen Members, hereby moves the Kentucky Public Service Commission ("Commission") to grant a seven (7) day extension of time in which to respond to the Commission's initial data requests, dated October 12, 2016, respectfully stating as follows:

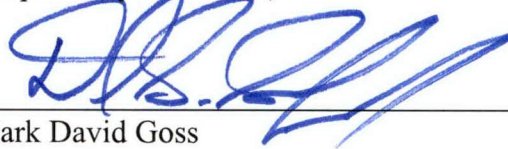
On October 12, 2016, the Commission issued an Order opening an investigation for the six-month review of EKPC's environmental surcharge and pass-through mechanisms. The October 12, 2016 Order contained a procedural schedule which allowed for the filing of direct testimony, data requests and a deadline for motions to intervene in the case. EKPC and its Members are in the process of preparing the testimony and responses to data requests, as required by the October 12th Order. However, due to the voluminous amount of records that will need to be compiled and collected (one response is anticipated to require production of approximately 1800 pages alone), EKPC respectfully requests that it be given one additional week to tender the direct testimony and data request responses.

EKPC does not object to any other adjustments to the procedural schedule which might be necessary to accommodate the brief extension of time to file testimony and data request responses, with one exception. EKPC respectfully requests that the Commission not reschedule the informal conference currently scheduled for November 9th as it will likely be focused upon a topic largely unrelated to the questions posed by the Commission in the October 12th Order and there are multiple Chief Executive Officers from EKPC's Members who plan to attend the informal conference. For these two reasons, EKPC respectfully requests that the November 9th informal conference be held as currently scheduled..

WHEREFORE, EKPC and its Members move the Commission for a seven (7) day extension of time in which to tender testimony and responses to the Commission's October 12, 2016 Order.

This 19th day of October, 2016.

Respectfully submitted,



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Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served by depositing same in the custody and care of the U.S. Mails, postage pre-paid, on this 19th day of October, 2016, addressed to the following:

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