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March 5, 2018

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MAR 05 2018

PUBLIC SERVICE  
COMMISSION

**VIA HAND DELIVERY**

Gwen R. Pinson, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40602

Re: IN THE MATTER OF: THE APPLICATION OF SOUTH KENTUCKY RURAL  
ELECTRIC COOPERATIVE CORPORATION FOR APPROVAL OF MASTER  
POWER PURCHASE AND SALE AGREEMENT AND TRANSACTIONS  
THEREUNDER - Case No. 2018-00050

Ms. Pinson:

Please find enclosed and accept for filing on behalf of South Kentucky Rural Electric Cooperative Corporation an original and ten (10) copies of its Motion for an Extension of Time to file responses to Requests for Information propounded in the above-styled matter. Please return a file-stamped copy of this filing to me.

I appreciate your assistance with this matter, and please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,



Mark David Goss

Enclosures

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

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**MAR 05 2018**

**PUBLIC SERVICE  
COMMISSION**

In the Matter of:

THE APPLICATION OF SOUTH KENTUCKY RURAL )  
ELECTRIC COOPERATIVE CORPORATION FOR ) Case No. 2018-00050  
APPROVAL OF MASTER POWER PURCHASE AND )  
SALE AGREEMENT AND TRANSACTIONS THEREUNDER )

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**MOTION FOR EXTENSION OF TIME**

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Comes now South Kentucky Rural Electric Cooperative Corporation (“South Kentucky”), by counsel, and hereby moves the Commission for an Order extending the deadline by which it must file its Responses to the initial Requests for Information propounded herein on or around February 28, 2018, by Commission Staff and the intervenors. Specifically, South Kentucky requests that it be allowed an additional five (5) days (i.e., until Monday, March 12, 2018) to file its Responses. In support of this Motion, South Kentucky states as follows:

1. South Kentucky has received five (5) sets of Requests for Information with 272 total items (including subparts) representing inquiry from seventeen (17) intervening parties and Commission Staff. The expedited procedural schedule, requested by South Kentucky and permitted by the Commission in its Order entered February 18, 2018, requires responses to be filed by South Kentucky no later than Wednesday, March 7, 2018.

2. At this time, the undersigned existing counsel for South Kentucky has identified a direct legal conflict requiring it to withdraw from its representation in this matter. South Kentucky is in the process of engaging substitute counsel to assist with this case prospectively and it is working swiftly to minimize any delay or disruption. However, due to the quantity, detail, and complexity

of the information sought in the various Requests for Information, a brief extension of time is sought to allow South Kentucky adequate time with new counsel to prepare and file the necessary responses.

3. South Kentucky believes its requested extension is supported by good cause and essential to the Commission's proper consideration of this important matter. South Kentucky expects substitute counsel to make an appearance imminently, at which time South Kentucky believes a slightly-amended procedural schedule can be discussed and entered. While South Kentucky hoped to avoid any deviation from the timeframes set forth by the Commission, South Kentucky intends to work diligently to allow the Commission the opportunity to provide an expedited decision in this matter.

WHEREFORE, on the basis of the foregoing, South Kentucky respectfully requests that the Commission enter an Order extending the deadline by which it must file responses to initial requests for information to Monday, March 12, 2018.

Dated this 5<sup>th</sup> day of March, 2018.

Respectfully submitted,



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*Counsel for South Kentucky Rural Electric  
Cooperative Corporation*

**CERTIFICATE OF SERVICE**

Pursuant to 807 KAR 5:001 Section 6, the undersigned certifies that, consistent with 807 KAR 5:001 Section 4(8)(d)(3), a copy of this document has been electronically served upon the following:

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This 5<sup>th</sup> day of March, 2018.



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Counsel for South Kentucky RECC