

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
SEP 05 2013
PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

APPLICATION OF HARDIN COUNTY WATER)
DISTRICT NO. 1 TO ADJUST ITS RATES) CASE NO: 2013-00050
FOR SEWER SERVICE)

**MOTION FOR LEAVE TO FILE RESPONSE TO DATA REQUEST NO. 2 OUTSIDE
OF THE PREVIOUSLY ESTABLISHED DEADLINE**

Comes the Petitioner, Hardin County Water District No. 1 (“HCWD1”) and respectfully requests that its Response to Data Request No. 2 be accepted outside of the time deadline established by the Commission by its Order entered July 30, 2013.


In support of its Motion, the District notes that the current matter is its first sewer rate case and, furthermore, the sewer system which the District acquired from the City of Radcliff is substantial, with approximately 8,900 customers. Additionally, the matter is further complicated by the fact that the District provides sewer treatment services to the Fort Knox military installation and also storm water services. Accordingly, the Commission has found it appropriate to inquire extensively regarding a multitude of topics. The Response to Data Request No. 1 consisted of over 1,500 pages of data. The preparation of the Response to Data Request No. 1 required the nearly undivided attention of the District’s Chief Financial Officer, Mr. Scott Schmuck, and the District’s Accounting Department for a period exceeding two weeks. Furthermore, the Response to Data Request No. 1 required significant investments of time of the District’s General Manager, James S. Bruce.

Data Request No. 2 appears to contain approximately 75 separate data requests. Said data request was received on August 15 and according to the scheduling order, the response was

due August 27, which is 12 days. The District is simply unable to produce the volume of data that the Commission requests in that amount of time. As the Commission is aware, in addition to operating the above-mentioned Radcliff Sewer, the Fort Knox Sewer, and the Fort Knox Storm Water, the District has also begun to operate the Fort Knox Water System and the County Water System. All of these operations require considerable diligence and oversight leaving inadequate time to fully and thoroughly address the second data requests in the time allotted by the scheduling Order.

For the foregoing reasons, it is requested that the Response to Data Request No. 2 be accepted outside of the deadline imposed by the scheduling order. Specifically, HCWD1 would propose that it have until September 13, 2013 in which to file appropriate responses. The District further understands that this would necessitate an amendment to the original scheduling order and a proposed amended appendix is attached for the Commission's consideration.

Respectfully submitted this 4 day of Sept, 2013.




David T. Wilson II
Skeeters Bennett Wilson & Pike
550 W. Lincoln Trail Blvd.
Radcliff, Ky 40160
Attorney for Hardin District

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has this 4 day of September, 2013 been mailed to:

Jeff Derouen
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

Hon. Gregory T. Dutton
Hon. Jennifer B. Hans
Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Dr., Ste 200
Frankfort, KY 40601



DAVID T. WILSON, II

H:\denise.freeland\Pam Whobrey\HCWD Mt. Leave to File Response Outside of Deadline.docx

AMENDED APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC
SERVICE COMMISSION IN CASE NO. 2013-00050 DATED JULY 30, 2013

All requests for Information to Hardin District shall
be served upon Hardin District no later than 08/13/2013

Hardin District shall file with the Commission and serve upon all
parties of record its Response to the First Request for Information
no later than 08/27/2013

Hardin District shall file with the Commission and serve upon all
parties of record its Response to the Second Request for Information
no later than 09/13/2013

All supplemental requests for information to Hardin District
shall be served upon Hardin District no later than 09/24/2013

Hardin District shall file with the Commission and serve upon
all parties of record its responses to supplemental requests for
information no later than 10/15/2013

Intervenor testimony, if any, shall be filed with the Commission in
verified prepared form no later than 10/28/2013

All requests for information to any Intervenor shall be served upon
that Intervenor no later than 11/11/2013

Intervenors shall file with the Commission and serve upon all
parties of record their responses to requests for information
no later than 11/18/2013

Hardin District may file with the Commission the testimony
of its rebuttal witnesses in written verified form no later than 12/02/2013

An informal conference will be held at the Commission's
offices in Frankfort, Kentucky, for the purpose of considering the
possibility of settlement, the simplification of issues, and any other
matters that may aid in the handling or disposition of this case,
beginning at 10:00 a.m. Eastern Standard Time, on 12/09/2013

Public Hearing for the purpose of cross-examination of
witnesses of Hardin District and Intervenors will be
held at the Commission's offices in Frankfort, Kentucky,
beginning at 10:00 a.m. Eastern Standard Time, on To be scheduled

Briefs, if any, shall be filed To be scheduled