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Damon R. Talley

September 20, 2013

Attorney At Law

Mr. Jeff Derouen
Executive Director
Public Service Commission
PO Box 615
Frankfort, KY 40602

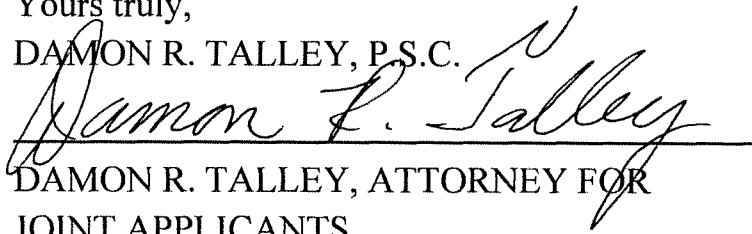
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SEP 21 2013
PUBLIC SERVICE
COMMISSION

RE: Case No. 2013-00311
Transfer Application
From: Mallard Point Disposal Systems, Inc.
To: City of Georgetown, Kentucky

Dear Mr. Derouen:

Enclosed for filing are the original and ten (10) copies of the Joint Applicants' Motion for an Extension of Time in this matter.

Yours truly,
DAMON R. TALLEY, P.S.C.


DAMON R. TALLEY, ATTORNEY FOR
JOINT APPLICANTS

cc: Mallard Point Disposal Systems, Inc.
City of Georgetown, Kentucky

Enclosure

13/GMWSS/Derouen Letter – 9-20-13

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF MALLARD)
POINT DISPOSAL SYSTEMS, INC. AND)
THE CITY OF GEORGETOWN, KENTUCKY)
FOR AN ORDER APPROVING THE)
TRANSFER OF OWNERSHIP OF THE)
WASTEWATER COLLECTION SYSTEM)
OF THE MALLARD POINT DISPOSAL)
SYSTEMS, INC. TO THE CITY OF)
GEORGETOWN, KENTUCKY)

CASE NO. 2013-00311

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PUBLIC SERVICE
COMMISSION

MOTION FOR EXTENSION OF TIME

The Joint Applicants, Mallard Point Disposal Systems, Inc. (“Mallard Point”) and the City of Georgetown, Kentucky (“City”), by counsel, jointly move the Commission for a seven (7) day extension of time in which to file the responses to the Commission Staff’s Request for Information dated September 16, 2013. For cause the Joint Applicants state as follows:

1. The Commission Staff’s Request for Information (“Information Request”) was issued on September 16, 2013 with a response due date of September 23, 2013. This allows only seven (7) days to compile the necessary information, prepare the narrative responses, and file the responses with the Commission.

2. Unfortunately, the timing of the response period could not have been worse. Several weeks ago, the General Manager of the Georgetown Municipal Water and Sewer Service (“GMWSS”), the Finance Director, the General Manager’s Administrative Assistant, and other key GMWSS personnel registered and made plans to attend the annual Software Solution User Conference in Ohio on Wednesday, September 18, 2013 through Friday, September 20, 2013. The Conference is sponsored by SSI, which is GMWSS’ current software provider. GMWSS is considering upgrading its software package to SSI’s newest product called VIP. The VIP product will be showcased at this conference. In addition, GMWSS personnel will be trained on additional upgrades and other software products. GMWSS cannot get a refund of the Conference registration fees which were paid several weeks ago. Thus, the General Manager and the aforementioned GMWSS staff members are in Ohio receiving training at this software conference while this Motion for an Extension of Time is being prepared.

3. Because of the unavailability of the General Manager and other key GMWSS staff members, it will be impossible for the Joint Applicants to prepare responses to the 22 questions contained in the Information Request within the seven (7) days originally allotted.

4. The Joint Applicants are confident that they can file their Response to the Information Request by September 30, 2013.

5. The Joint Applicants readily acknowledge that the requested extension of time and the delay in providing the responses to the Information Request will prevent the Commission from completing its review of the Joint Application for the transfer of assets from Mallard Point to the City and issuing its Order prior to the original Closing Date of September 30, 2013. Therefore, the Joint Applicants have tentatively **rescheduled** the Closing Date for **Friday, October 11, 2013**.

6. Hopefully, delaying the Closing will afford the Commission adequate time to review the Joint Application and the materials that will be filed in response to the Information Request before the new Closing Date.

7. The Joint Applicants respectfully request the Commission to issue its Order by **Monday, October 7, 2013**.

Respectfully submitted this 20th day of September, 2013.

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