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## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

OCT 01 2014

PUBLIC SERVICE

COMMISSION

IN THE MATTER OF:

JOINT APPLICATION OF W&W SERVICE		
CORPORATION AND PADUCAH-	)	Case No. 2014-00013
MCCRACKEN COUNTY JOINT SEWER AGENCY	)	
O APPROVE THE TRANSFER OF OPERATIONS	)	
OF THE TERRE VERTE SUBDIVISION		
WASTEWATER TREATMENT FACILITIES TO	)	
PADUCAH-MCCRACKEN COUNTY JOINT	)	
SEWER AGENCY	)	

## MOTION FOR EXTENSION OF TIME

Petitioners hereby move for an extension of time to complete the transfer contemplated by this filing. As grounds therefore, Petitioners state that they have experienced unanticipated delays due to required wetlands mitigation and environmental issues pertaining to the presence of the Indiana bat on party of the subject property. Further, obtaining the necessary easements to connect the JSA system to the Terre Verte subdivision proved to take longer than anticipated. As such, construction has not been completed. Accordingly, Petitioners were unable to meet the deadline of September 30, 2014, imposed by numbered paragraph 2 of the Commission's Order dated July 18, 2014.

Wherefore, the Petitioners respectfully request that the Commission modify its previous Order and allow them up to and including December 31, 2014, to complete the connection and transfer of the wastewater collection system.

Respectfully submitted,

DENTON & KEULER

P.O. Box 929

Paducah, KY 42002-0929

Tele: 270-443-8253

Facsimile/270-442-6000

By Melissa D. Yates

ATTORNEYS FOR PETITIONERS

I hereby certify that a true and correct copy of the foregoing has been served via Federal Express to:

MR JEFF DEROUEN EXECUTIVE DIRECTOR KENTUCKY PUBLIC SERVICE COMMISSION 211 SOWER BLVD. FRANKFORT KY 40602

on this 30 day of September, 2014.

By: Melissa D. Yates