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May 21, 2014

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

**RE: TROUBLESOME CREEK ENVIRONMENTAL AUTHORITY, INC.  
AND KNOTT COUNTY WATER AND SEWER, INC.  
CASE NO. 2014-00138**

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above referenced case an original and ten (10) copies of Troublesome Creek Environmental Authority, Inc. and Knott County Water And Sewer, Inc.'s Motion for Extension of Time.

Thank you for your attention to this matter.

Best regards,



Calvin R. Tackett

Enclosure

cc. Assistant Attorney General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601

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

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

JOINT APPLICATION OF TROUBLESOME )  
CREEK ENVIRONMENTAL AUTHORITY, INC. )  
FOR AN ORDER APPROVING A TRANSFER OF )  
OWNERSHIP AND CONTROL OF A )  
JURISDICTIONAL ASSET TO KNOTT COUNTY )  
WATER AND SEWER, INC. )

CASE NO.  
2014-00138

**MOTION FOR EXTENSION OF TIME**

COMES NOW, the Joint petitioners Troublesome Creek Environmental Authority, Inc., hereinafter "TEA" and Knott County Water and Sewer, Inc., hereinafter "KCW&S" by and through counsel and hereby moves the Commission for an extension of time wherein to respond to Commission Staff's Initial Request for Information, hereinafter "Request". For its grounds the Joint Petitioners state that the Commission Staff's request was dated May 9, 2014 and indeed the envelope shows it was mailed on May 9, 2014. The Request asks for a reply by May 19, 2014.

However and inexplicably, the request was not received by the undersigned until Monday, May 19<sup>th</sup>, the very date a reply was due. This give rise to an automatic need for an extension.

Aside from the belated receipt, it would not have mattered had the request been received sooner as the Joint Petitioner's would have struggled to meet the original ten (10) day reply period.

The Commission Staff's Request seeks nineteen (19) questions with fifty six (56) subparts. The request runs the gamut from simple to complex answers. Most of the questions require record retrieval and analysis. The requests are directed to both

Petitioners thereby requiring both entities to devote considerable time and resources to answer. While the effort to respond to the request can be done, it should be noted that TEA has no staff but relies upon Kentucky River Development staff (KRADD) to maintain its administrative and corporate governance responsibilities. Knott County Water and Sewer, Inc. does have the staff to comply but they will need to make time from operations duties to adequately and fully address the questions.

FINALLY, to answer these requests will involve consultation with outside consultants such as consulting project engineers whose time is not solely dedicated to the Joint Petitioner's beck and call.

WHEREFORE, these Joint Petitioners respectfully moves the Commission for an Order granting an additional twenty (20) days from the original reply date of May 19, 2014 within which to fully and adequately respond.

Respectfully submitted,



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Calvin R. Tackett, Attorney  
For Joint Petitioners