COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE WATER SERVICE RATES OF THE CITY OF AUGUSTA

) CASE NO.) 2015-00039

MOTION FOR EXTENSION OF TIME

Comes now City of Augusta, by and through counsel, and respectfully requests that the Public Service Commission grant Movant an extension of time, by which to complete the filing with the Public Service Commission the information listed in Appendix B to the Order entered herein on February 10th, 2015.

As grounds, the City of Augusta states the following reasons, for good cause shown:

- The undersigned City Attorney is not a full time salaried employee of the City of Augusta, and does not practice regularly in front of the Public Service Commission. The City of Augusta therefore requests additional time to consider and investigate the possibility of retaining outside counsel or co-counsel to assist with this matter.
- 2. The City of Augusta does not have the resources and personnel to compile all of the information and documentation requested by February 19th, 2015, having been first made aware of such Order February 10th, 2015, and in the interim, having had President's Day and several days of snow emergencies, which snow emergency is presently ongoing.

Wherefore, the City of Augusta, for good cause shown, requests an additional thirty (30) days by which to compile and submit the requested information.

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PUBLIC SERVICE COMMISSION Dated February 18th, 2015

Respectfully Submitted,

Cynthia C. Thompson Cynthia C. Thompson

Cynthia C. Thompson Augusta City Attorney 202 East Riverside Drive Augusta, Kentucky 41002 <u>ccthompsonatty@yahoo.com</u> Telephone: (606) 756-2663 Fax: (606) 756-2664

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 187 day of February, 2015, that

she mailed by First Class US Mail, an original or true and accurate copy of the foregoing to the

following:

Original Sent Overnight Mail To: Kentucky Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, Kentucky 40 602-0615

Copy Mailed Via First Class US Mail & E-mailed To: Hon. Gerald E. Wuetcher Stoll Keenon Ogden PLLC 300 West Vine St. Suite 2100 Lexington, KY 40507-1801 gerald.wuetcher@skofirm.com

Cynthie C. Thompson

Cynthia C. Thompson Augusta City Attorney