

## BRIAN CUMBO

86 W. Main St., Suite 100 P.O. Box 1844 Inez, KY 41224 (606) 298-0428 FAX: (606) 298-0316 cumbolaw@cumbolaw.com

**RECEIVED** 

ADMITTED IN KY AND WV

JUL 7 2016

Public Service Commission

July 1, 2016

Aaron Greenwell, Acting Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

RE: Martin County Water District PSC Case No. 2016-00142

Dear Mr. Greenwell:

Enclosed please find an unbound original, and ten (10) additional copies of Motion for Extension of Time on behalf of the Martin County Water District in this matter. Would the Commission please give this Motion its' appropriate consideration?

Thank you for your attention to this matter.

Very truly yours,

**BRIAN CUMBO** 

BC/ld Enclosure

cc: Martin County Water District

## COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JUL 7 2016

Public Service Commission

INVESTIGATION OF THE OPERATING CAPACITY OF MARTIN COUNTY WATER DISTRICT PURSUANT TO KRS 278.280

CASE NO. 2016-00142

**MOTION FOR EXTENTION OF TIME** 

)

\*\*\*\*\*\*\*\*

Comes the Martin County Water District, by counsel, and moves the Public Service Commission for an extension of time in which to fully and completely respond to the Commission's second request for information dated June 21, 2016. Specifically, the Order directed the District to provide certain information no later than July 7, 2016. Due to summer vacations and the July 4<sup>th</sup> holiday, the District personnel necessary to fully respond will be unavailable.

That the Water District is utilizing its' best efforts to be fully and completely responsive to the request of the Commission, and requires an extension of time in order to be fully and completely responsive, and requests up to and until August 7, 2016.

Wherefore, the movant requests the appropriate Orders consistent with this request.

**BRIAN CUMBO** 

COUNSEL FOR MARTIN COUNTY

WATER DISTRICT P.O. BOX 1844

INEZ, KY 41224

TELEPHONE: (606) 298-0428 TELECOPIER: (606) 298-0316 EMAIL: cumbolaw@cumbolaw.com

## CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was mailed, postage paid, on this the day of July, 2016, to the following:

Aaron Greenwell, Acting Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

BRIAN CUMBO

## COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION
In the Matter of:
INVESTIGATION OF THE OPERATING ) CAPACITY OF MARTIN COUNTY WATER ) DISTRICT PURSUANT TO KRS 278.280 )  CASE NO. 2016-00142
AFFIDAVIT IN SUPPORT OF MOTION FOR EXTENTION OF TIME
*********
Comes the affiant, Joe Hammond, Business Manager for the Martin County Water District
after first being duly sworn, upon his oath, and states as follows:
That due to summer vacations and the July 4 <sup>th</sup> holiday, the District personnel necessary to
fully respond to the Public Service Commission's second request for information will be
unavailable.
And further affiant saith naught.  JOE HAMMOND
STATE OF KENTUCKY) COUNTY OF MARTIN)
SUBSCRIBED, ACKNOWLEDGED and SWORN TO before me by Joe Hammond this
the _/ <del>5t</del> _ day of July, 2016.
My Commission Expires: $9-18-18$
Lisly a Dimpsy NOTARY PUBLIC, STATE AT LARGE