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BRIAN CUMBO

PUBLIC SERVICE COMMISSION

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

ADMITTED IN KY AND WV

December 28, 2017

Public Service Commission ATTN: Hon. Jeb Pinney P.O. Box 615 Frankfort, KY 40602

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

Dear Mr. Pinney

Enclosed please find Martin County Water District's Motion for Extension of Time regarding the above matter.

Thank you for your time and attention to this matter.

Very truly yours,

BRIAN CUMBO

BC/ld Enclosure

cc: Hon. Mary Varson Cromer Martin County Water District

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COMMONWEALTH OF KENTUCKY

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION OF THE OPERATING)
CAPACITY OF MARTIN COUNTY WATER) CASE NO. 2016-00142
DISTRICT PURSUANT TO KRS 278.280)

MOTION FOR EXTENSION OF TIME

Comes the Martin County Water District (District), by counsel, and moves the Public Service Commission for an extension of time in which to respond to the Commission's request for information and the request for information propounded by Martin County Concerned Citizens, Inc.

As grounds therefore, the Commission entered an Order on December 21, 2017 ordering that not only must the District respond to the requests for information propounded by Martin County Concerned Citizens, Inc., but also must respond to request for information promulgated by the Public Service Commission, and established a deadline of January 10, 2018.

That this deadline is unrealistic, given the breadth and depth of the request for information, the timing of the Order coming just before the Christmas and New Year holidays, and the limited staff and ability of the District to continue its day to day operations as it struggles to bring four new Commissioners up to date on the situation facing them.

The day to day business of the District must take priority, and when time is available, the staff dedicates its efforts to responding to the Commission's ongoing request for information.

That there are simply not enough hours in the day and not enough days in the week in which to comply with the Commission's deadline of January 10, 2018.

Wherefore, counsel requests appropriate Orders of the Public Service Commission consistent with this Motion.

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 pre-paid, on this the day of December, 2017, to the following:

Public Service Commission ATTN: Jeb Pinney P.O. Box 615 Frankfort, KY 40602

Hon. Mary Varson Cromer Appalachian Citizens' Law Center, Inc. 317 Main Street Whitesburg, KY 41858

BRIAN CUMBO