

**Dinsmore & Shohl** LLP  
ATTORNEYS

Edward T. Depp  
502-540-2347  
tip.depp@dinslaw.com

RECEIVED  
OCT 29 2007  
PUBLIC SERVICE  
COMMISSION

October 29, 2007

**VIA HAND-DELIVERY**

Hon. Beth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

**Re: *Application of Kentucky-American Water Company, a/k/a Kentucky American Water for Certificate of Convenience and Public Necessity Authorizing Construction of Kentucky River Station II ("KRS II"), Associated Facilities, and Transmission Line; Case No. 2007-00134***

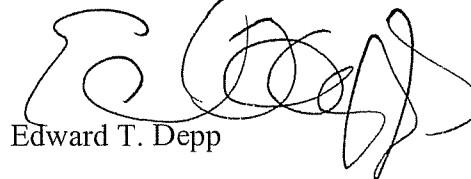
Dear Ms. O'Donnell:

We have enclosed, for filing with the Public Service Commission of the Commonwealth of Kentucky ("Commission"), an original and ten (10) copies, of the Louisville Water Company's Motion for Extension of Time.

Thank you, and if you have any questions, please call us.

Very truly yours,

**DINSMORE & SHOHL LLP**



Edward T. Depp

ETD/bmt  
Enclosures

cc: All Parties of Record (w/enclosures)  
Barbara K. Dickens, Esq. (w/enclosures)  
John E. Selent, Esq. (w/o enclosures)

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 29 2007

PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF: )  
)  
THE APPLICATION OF KENTUCKY-AMERICAN )  
WATER COMPANY FOR A CERTIFICATE OF ) CASE NO. 2007-00134  
CONVENIENCE AND NECESSITY AUTHORIZING )  
THE CONSTRUCTION OF KENTUCKY RIVER )  
STATION II, ASSOCIATED FACILITIES AND )  
TRANSMISSION MAIN )

**LOUISVILLE WATER COMPANY'S MOTION FOR EXTENSION OF TIME**

Louisville Water Company ("LWC"), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission") for a short extension of time within which to file its amended responses to initial Data Request Nos. 15, 46 and 117 of Kentucky-American Water Company ("KAWC").

In support of its motion, LWC states that the Commission's October 24, 2007 order (the "Order") compelled LWC to produce additional documentation in response to initial Data Request Nos. 15, 27, 46, 53, 68, and 117. With respect to the additional production required for Request Nos. 15, 27, 53, and 68, the Commission ordered LWC to provide the additional information no later than Monday, October 29, 2007. The Order did not specify a date by which LWC was required to produce the information required with respect to Request Nos. 46 and 117. LWC believed this discrepancy in the Order was intentional, as Request Nos. 46 and 117 concern matters that will require voluminous amounts of document retrieval, review, and reproduction.

On Friday, October 26, LWC was attempting to complete its responses to the 108 (not counting subparts) supplemental data requests it received on October 15. Those responses were due on Monday, October 29, 2007. LWC was simultaneously attempting to complete its responses to the additional data requests the Commission had ordered be amended by that same date. (*See Order at*

5-6.) The Friday afternoon before those responses and amended responses were due, the Commission informed LWC that it would be issuing an order (“Supplemental Order”) requiring LWC to amend its responses to KAWC initial Request Nos. 46 and 117, too. The Commission informed LWC at that time that the responses to initial Request Nos. 46 and 117 would also be due just one business day later on Monday, October 29, 2007.

In addition to attempting to complete its other work (including the preparation of an amended response to Request No. 15, which requires a search of LWC's email system and the review of a significant number of emails among a number of individual employees at LWC), LWC began work retrieving and reviewing the additional documentation to be required by the Supplemental Order. As with LWC's response to Request No. 15, LWC's responses to Request Nos. 46 and 117 require a significant research and review of internal correspondence and email (Request 117), as well as a detailed analysis of historical project files (Request 46). As a result of the extensive amount of work associated with these obligations, LWC is unable to respond to KAWC initial Request Nos. 15, 46 and 117 by Monday, October 29, 2007.<sup>1</sup> LWC continues to work diligently to respond to these requests as soon as possible, and it will be able to do so no later than Monday, November 5, 2007.

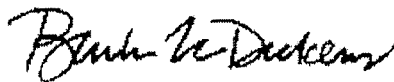
KAWC and the other parties will not be harmed by this short extension of time, as any remaining testimony is not due until Tuesday, November 13, 2007. The hearing is two weeks beyond that date. As KAWC has previously claimed, “the only formal proposal in this case is [KAWC]’s, and this case is for consideration of that proposal.” (KAWC Response to LWC Motion for Informal Conference(s) at 1.) In any event, an LWC production in response to those requests

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<sup>1</sup> Although LWC has not yet completed its review of internal documentation with respect to Request No. 15, it has produced those responsive documents that it has been able to locate and review by today. Nevertheless, LWC has included its response to this request within the scope of this motion because it anticipates the potential for producing additional documents as it completes its review of potentially responsive documents.

will still permit KAWC (as the movant) and the parties over a week to review this additional information before KAWC's final rebuttal testimony is due. Accordingly, LWC respectfully requests that the Commission grant it until Monday, November 5, 2007 to respond to KAWC initial Request Nos. 15, 46 and 117.

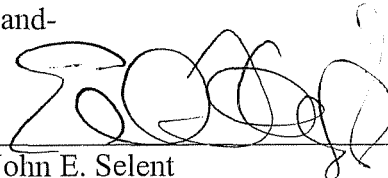
Respectfully submitted,



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Barbara K. Dickens  
Vice President and General Counsel  
Louisville Water Company  
550 South Third Street  
Louisville, KY 40202  
tel: (502) 569-0808  
fax: (502) 569-0850

-and-



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John E. Selent  
Edward T. Depp  
**DINSMORE & SHOHL LLP**  
1400 PNC Plaza  
500 West Jefferson Street  
Louisville, KY 40202  
tel: (502) 540-2300  
fax: (502) 585-2207

*Counsel to Louisville Water Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by was served via first-class United States mail, sufficient postage prepaid, on the following individuals this 29th day of October, 2007:

David Jeffrey Barberie  
Corporate Counsel  
Lexington-Fayette Urban County Government  
Department of Law  
200 East Main Street  
Lexington, KY 40507

David F. Boehm  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
2110 CBLD Building  
Cincinnati, OH 45202

Thomas J. FitzGerald  
Counsel & Director  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KY 40602

Lindsey W. Ingram, III  
Attorney at Law  
Stoll Keenon Ogden PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KY 40507-1801

Kentucky River Authority  
70 Wilkinson Boulevard  
Frankfort, KY 40601

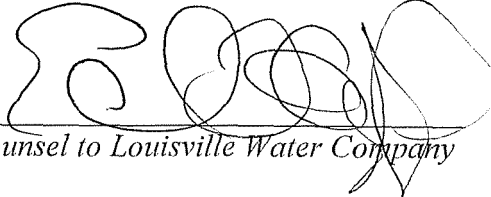
Michael L. Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
2110 CBLD Building  
Cincinnati, OH 45202

David Edward Spenard  
Assistant Attorney General  
Office of the Attorney General Utility & Rate  
1024 Capital Center Drive  
Suite 200  
Frankfort, KY 40601-8204

Damon R. Talley  
Attorney at Law  
P.O. Box 150  
Hodgenville, KY 42748-0150

A.W. Turner, Jr.  
Attorney at Law  
Kentucky-American Water Company aka Kentucky American Water  
2300 Richmond Road  
Lexington, KY 40502

John N. Hughes  
124 West Todd Street  
Frankfort, KY 40601



*Counsel to Louisville Water Company*