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May 1, 2012

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PUBLIC SERVICE
COMMISSION

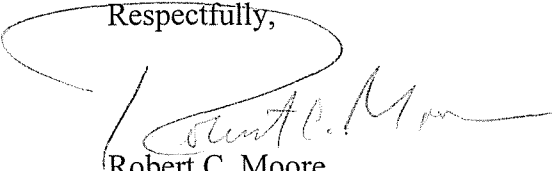
Mr. Jeff R. Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602-0615

Re: Forest Creek vs. Jessamine - South Elkhorn Water District,
Public Service Commission Case No. 2011-00297

Dear Executive Director Derouen:

Please find enclosed for filing in the above-referenced case the original and ten (10) copies of Forest Creek, LLC's Response to Jessamine-South Elkhorn Water District's Motion to Extend and Adjust the Procedural Schedule. Please contact me if you would like to discuss this matter, or need any further information concerning same.

Respectfully,



Robert C. Moore

RCM/neb

cc: Jerry Wuetcher - via electronic mail

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the matter of:

FOREST CREEK, LLC)

COMPLAINANT)

vs.)

JESSAMINE- SOUTH ELKHORN WATER DISTRICT)

DEFENDANT)

Case No. 2011-00297

**FOREST CREEK, LLC'S RESPONSE TO
JESSAMINE-SOUTH ELKHORN WATER DISTRICT'S MOTION TO EXTEND AND
ADJUST THE PROCEDURAL SCHEDULE**

Comes the Complainant, Forest Creek, LLC ("Forest Creek"), by counsel, and for its Response to the Motion to Adjust and Extend Procedural Schedule filed by Jessamine - South Elkhorn Water District ("Water District"), states as follows:

1) As was previously stated in its Motion for Extension of Time filed on April 13, 2012, Forest Creek first received notice that the Water District had served Requests for Information in the above referenced case when counsel for the Water District advised the undersigned of that fact during a telephone conference on Monday, April 9, 2012. Water District counsel, on April 9, 2012, forwarded to the undersigned an electronic copy of the Water District's Information Requests, but the hard copy of the requests have never been received.

2) The Answers to the Water District's Information Requests were due on Friday, April 13, 2012. Due to the difficulty in answering the Water District's 29 separate information requests in four (4) days, Forest Creek requested an extension of time until Wednesday, April

April 18, 2012, within which to file and serve its answers to the information requests of the Water District. Forest Creek then worked diligently to prepare its answers to the Water District's Information Requests, and filed its answers with the Commission on April 19, 2012, and served them on Water District's counsel on the same date. Forest Creek then filed and served Attachment B to its Answers to the Water District's Information Requests on April 23, 2012, and provided electronic copies of a portion of Attachment B, while awaiting the Commission's ruling on its Motion to file these records electronically due to their size. With the exception of the legend for a plat included in Attachment B, upon information and belief, the Water District already had copies of the documents in Attachment B. In any event, Forest Creek responded to the Water District's Requests for Information within fourteen (14) days of receiving the requests.

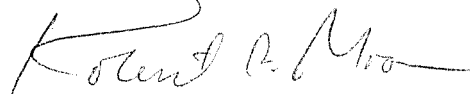
3) Due to the Water District's failure to provide full and complete answers to Forest Creek's Request for Information Nos. 1, 2, 3, 4, 16 and 23, Forest Creek filed a Motion to Compel on April 30, 2012, requesting the Commission to issue an order requiring the Water District to provide full and complete answers to these information requests. Until full and complete answers are provided to these information requests, it will be difficult for Forest Creek to prepare meaningful Supplemental Requests for Information as provided for by the Commission's March 16, 2012 Order.

4) In response to the Water District's Motion, Forest Creek does not object to the Water District's request for an extension of time to file Supplemental Requests for Information, but requests that the extension be granted until Friday, May 4, 2012, and that date upon which to file responses to the Requests for Supplemental Information be extended until Friday, May 18, 2012.

5) Forest Creek further requests the Commission to allow it to serve additional Supplemental Requests for Information upon the Water District should the additional requests be necessary after Forest Creek has reviewed the Water District's full and complete answers to Request for Information Nos. 1, 2, 3, 4, 16 and 23, assuming the Commission enters an order compelling the Water District to answer these requests.

6) In conclusion, with respect to the Water District's motion, Forest Creek requests the Commission to enter an order granting the parties until Friday, May 4, 2012, to file any Requests for Supplemental Information, and that the date for responding to the Requests for Supplemental Information be extended until Friday, May 18, 2012.

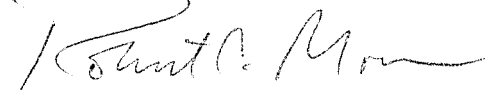
Respectfully submitted,



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P. O. Box 676
Frankfort, KY 40602-0676
Counsel for Forest Creek, LLP

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served by first class mail, postage prepaid, this the 1st day of May, 2012, to, Hon. Bruce E. Smith, **BRUCE E. SMITH LAW OFFICES, PLLC**, 201 South Main Street, Nicholasville, Kentucky 40356.



Robert C. Moore