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August 2, 2019

RECEIVED

Ms. Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

AUG 05 2019

PUBLIC SERVICE  
COMMISSION

**Re: Nicholas County Water District  
Overdue PSC Annual Reports and Audit Reports  
Motion for Extension of Time**

Dear Ms. Pinson:

Enclosed is Nicholas County Water District's Motion for Extension of Time relating to its overdue 2017 and 2018 PSC Annual Reports and Audit Reports.

In accordance with 807 KAR 5:001, Section 7, I certify that an original and ten (10) additional copies of this filing in paper medium are being mailed to the Public Service Commission this day.

Should you have any questions, please contact me at your convenience.

Sincerely,

Stoll Keenon Ogden PLLC

A handwritten signature in cursive script that reads "Katelyn Brown".

Katelyn Brown

KLB  
Enclosures

RECEIVED

AUG 05 2019

PUBLIC SERVICE  
COMMISSION

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**OVERDUE PSC ANNUAL REPORTS            )  
AND AUDIT REPORTS OF NICHOLAS        )  
COUNTY WATER DISTRICT AS            ) CASE NO. 2019- 00272  
REQUIRED BY 807 KAR 5:006,            )  
SECTION 4(2) AND (3) AND KRS         )  
278.230                                        )**

**MOTION FOR EXTENSION OF TIME**

To comply with the filing requirements of 807 KAR 5:006, Section 4(2) and (3) and KRS 278.230, Nicholas County Water District (“Nicholas District”) hereby moves for an Extension of Time to file its overdue 2017 and 2018 PSC Annual Reports and Audit Reports. Nicholas District requests that it has until August 30, 2019 in which to file its 2017 PSC Annual Report and Audit Report and until September 30, 2019 in which to file its 2018 PSC Annual Report and Audit Report. In support of its motion, Nicholas District states:

1. The full name and post office address of Nicholas District is: Nicholas County Water District, 1639 Old Paris Road, Carlisle, Kentucky 40311.
2. Nicholas District’s electronic mail address is: ncwd@bellsouth.net.
3. Nicholas District is not a corporation, limited liability company, or limited partnership. It has no articles of incorporation or partnership agreements.

4. Nicholas District is a water district organized pursuant to KRS Chapter 74.

5. Nicholas District services areas of Nicholas County, Kentucky. It provides retail water service to approximately 1,530 customers.

6. Pursuant to 807 KAR 5:001, Section 4(8), copies of all orders, pleadings, and other communications related to this proceeding should be directed to:

Monica Pryor  
Office Manager  
Nicholas County Water District  
1639 Old Paris Road  
Carlisle, KY 40311  
Phone: (859) 289-3157  
Fax: (859) 289-8131  
ncwd@bellsouth.net

Damon R. Talley  
Stoll Keenon Ogden PLLC  
P.O. Box 150  
Hodgenville, KY 42748-0150  
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7. The Extension of Time is necessary to enable Nicholas District's independent accounting firm, John T. Lane & Associates LLC, to complete the overdue PSC Annual Reports and Audit Reports. Joel Lane is the certified public accountant who is performing the Audit and preparing the PSC Annual Reports and Audit Reports.

8. Unfortunately, Joel Lane has experienced serious and prolonged health issues during the past year. Mr. Lane states that he has returned to his office and is physically and mentally able to complete the PSC Annual Reports and Audit Reports for Nicholas District. The undersigned attorney had a frank discussion with Mr. Lane on July 31, 2019. Mr. Lane assured him that he will definitely be able to complete the 2017 PSC Annual Report and the 2017 Audit Report by no later than **Friday, August 30, 2019**.

9. Mr. Lane also assured the undersigned attorney that he will be able to complete the 2018 PSC Annual Report and the 2018 Audit Report by no later than **Monday, September 30, 2019**.

10. For the past several months, the Nicholas District Office Manager, Monica Pryor, has diligently contacted Mr. Lane's office and inquired on the status of the overdue PSC Annual Reports and Audit Reports. Ms. Pryor also made numerous inquiries to other accounting firms in the Central Kentucky area in an effort to engage their services to perform the audit and prepare the PSC Annual

Reports and Audit Reports. All of these firms indicated that they would be unable to commence work for Nicholas District until December 2019. Apparently, they are all busy preparing audit services for cities, county governments, school boards, and other entities which have fiscal years ending on June 30.

11. 807 KAR 5:006, Section 4(2) and (3) state that the Executive Director of the Commission shall, upon application in writing, allow an appropriate extension of time for the filings when good cause is shown. Good cause exists in the present case. Given the serious and prolonged health issues of Nicholas District's certified public accountant and the unwillingness of other accounting firms to complete the PSC Annual Reports and Audit Reports, Nicholas District has shown good cause to justify an extension of time.

**WHEREFORE,** Nicholas District respectfully requests that the Commission grant its Motion for Extension of Time to file its 2017 and 2018 PSC Annual Reports and Audit Reports, as required by 807 KAR 5:006, Section 4(2) and (3) and KRS 278.230. Specifically, Nicholas District requests that it has until August 30, 2019 in which to file its 2017 PSC Annual Report and Audit Report and until September 30, 2019 in which to file its 2018 PSC Annual Report and Audit Report.

Dated: August 2, 2019

Respectfully submitted,



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*Counsel for Nicholas County Water District*

## CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 7, the undersigned hereby certifies that an original and ten (10) additional copies in paper medium are being mailed to the Public Service Commission on August 2, 2019.

  
Damon R. Talley