COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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IN THE MATTER OF:

PUBLIC SERVICE COMMISSION

JOINT APPLICATION OF PURCHASE PUBLIC		
SERVICE CORPORATION AND PADUCAH-)	Case No. 2013-00333
MCCRACKEN COUNTY JOINT SEWER AGENCY)	
TO APPROVE THE TRANSFER OF OPERATIONS)	
OF THE BLANDVILLE WEST SUBDIVISION		
WASTEWATER TREATMENT FACILITIES TO)	
PADUCAH-MCCRACKEN COUNTY JOINT)	
SEWER AGENCY)	

MOTION FOR EXTENSION OF TIME

Petitioners hereby move for an extension of time to complete the transfer contemplated by this filing. As grounds therefore, the Petitioners state that the winter weather conditions have prevented JSA from extending its lines to connect to the Blandville West Subdivision's wastewater collection system. Accordingly, Petitioners will be unable to meet the deadline of March 31, 2014, imposed by numbered paragraph 3 of the Commission's Order dated December 23, 2013. Concerns about winter weather preventing construction were previously raised in an email to staff in October of 2013. Unfortunately, those concerns materialized in the form of a particularly harsh winter and have made it impossible for the parties to finalize this transfer.

Wherefore, the Petitioners respectfully request that the Commission modify its previous Order and allow them up to and including May 31, 2014, to complete the connection and transfer of the wastewater collection system.

Respectfully submitted,

DENTON & KEULER

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By Melista D Vates

ATTORNEYS FOR PETITIONERS

I hereby certify that a true and correct copy of the foregoing has been served via Federal Express to:

MR JEFF DEROUEN EXECUTIVE DIRECTOR KENTUCKY PUBLIC SERVICE COMMISSION 211 SOWER BLVD. FRANKFORT KY 40602

on this 21st day of March, 2014.

Molinga D. Votas