

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:


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

MOTION FOR EXTENSION OF TIME

Comes the Martin County Water District (“District”), by counsel, and moves the Commission for an Order granting the District an extension of time to respond to the Public Service Commission’s Post Hearing Request for Information dated August 31, 2018, now due on September 19, 2018.

As grounds therefore, the District has ongoing raw water supply issues consuming their available time, and an additional period of time is necessary to respond. The District requests an additional thirty (30) days.

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


 BRIAN CUMBO
 COUNSEL FOR MARTIN COUNTY
 WATER DISTRICT
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 INEZ, KY 41224
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CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was emailed and mailed, postage paid, on this the 13th day of September, 2018, to the following:

Public Service Commission (*Via Email & USPS*)
P.O. Box 615
Frankfort, KY 40602
brittany.koenig@ky.gov

Hon. Mary Varson Cromer (*Via Email only*)
Appalachian Citizens' Law Center, Inc.
317 Main Street
Whitesburg, KY 41858
mary@appalachianlawcenter.org

Hon. M. Todd Osterloh (*Via Email only*)
Hon. James Wilson Gardner
Sturgill, Turner, Barker & Moloney, PLLC
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BRIAN CUMBO

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AFFIDAVIT OF GREG SCOTT

Comes the Affiant, Greg Scott, after being duly sworn, and states as follows:

1. That I, Greg Scott, am the interim General Manager of the Martin County Water District.
2. That the District has ongoing raw water supply issues consuming all of our time.
3. The District respectfully requests a thirty (30) day extension to respond to the PSC's Data Request that is now due on September 19, 2018.

Further the Affiant saith naught.



GREG SCOTT

STATE OF KENTUCKY)

COUNTY OF MARTIN)

SUBSCRIBED, ACKNOWLEDGED and SWORN TO before me by Greg Scott this the

13th day of September, 2018.

My Commission Expires: 9-18-18.

Lesley A Hempsey
NOTARY PUBLIC, STATE AT LARGE