

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

IN THE MATTER OF:)

ELECTRONIC APPLICATION OF BULLITT)
UTILITIES, INC. FOR A SURCHARGE)

CASE NO. 2016-00401

**MOTION OF BU FOR AN EXTENSION OF TIME TO
FILE ITS RESPONSE TO THE DEFICIENCIES IDENTIFIED IN THE
COMMISSION'S DECEMBER 29, 2016 ORDER**

Bullitt Utilities, Inc. ("BU"), by Robert W. Keats, Chapter 7 Trustee for BU (the "Trustee"), files this Motion for an Extension of Time to respond to the deficiencies with BU's Surcharge Application identified in the Commission's December 29, 2016 Order. The Commission directed BU to respond in 10 days or by January 9, 2017, and good cause exists to grant BU a short extension of time until January 13, 2017 to respond. The grounds to support BU's Motion follow.

1 The Commission identified 18 deficiencies with BU's Surcharge Application and the BU cannot address all deficiencies in 10 days.

2 The Trustee does not have all the information requested by the Commission and is consulting with former management for BU and the BCSD to complete its Response.

3 BU is creating documents which do not exist to address some of the deficiencies.

4 BU is also preparing a Response to Legal Issues identified in the Commission's December 29, 2016 Order due on January 13, 2017 and granting this short extension will make both Responses due that day.

5 BU is only requesting an additional four days for filing its Response and there has been no Procedural Schedule set so no party will be prejudiced by granting this Motion.

For the reasons above, BU's Motion for an Extension of Time to respond to the deficiencies should be granted and BU given until January 13, 2017 to respond.

Respectfully submitted,

/s/ Holland N. McTyeire V

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CERTIFICATE OF SERVICE

I certify that on January 9, 2016 an electronic version of the Motion Of BU For An Extension Of Time To File Its Response To The Deficiencies Identified In The Commission's December 29, 2016 Order was uploaded to the Commission's E-Filing System. A copy of the Electronic Filing Center Notification is included with the filing of this Motion with the Commission. The electronic version of the paper filing is a true and accurate copy of each paper filed in paper medium. No party has been excused from the Commission's electronic filing procedures.

/s/ Holland N. McTyeire V

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