

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)
MCCREARY COUNTY WATER DISTRICT)
PURSUANT TO 807 KAR 5:071, SECTION 7(4)) CASE NO. 2017-00246
FOR APPROVAL OF PROPOSED)
INSPECTION PROCEDURES)

**MOTION FOR ADDITIONAL TIME TO RESPOND TO
COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION
AND FOR A REDUCTION IN NUMBER OF REQUIRED COPIES**

McCreary County Water District (“McCreary District”) moves for an extension of time until November 10, 2017 to respond to Commission Staff’s First Request for Information and for leave to file only six copies of its responses to that Request. In support of its Motion, McCreary District states:

1. On October 10, 2017, Commission Staff issued its First Request for Information. In this request, Commission Staff requested among other things the number of grinder pump station failures since January 1, 2010, the number of customer complaints regarding grinder pump stations since January 1, 2010, and a description of the resolution of each of these complaints. Commission Staff requested that a response to its request be submitted no later than October 24, 2017.

2. To ensure an accurate and complete response to Commission Staff’s request, McCreary District must review all of its work orders from January 1, 2010 to present. McCreary District estimates the number of these work orders to be approximately 11,500. These work orders are in paper format only. Each work order must be physically retrieved and reviewed to determine if it involved a grinder pump failure, the nature of the failure, and the corrective action performed. Such effort will place significant demands on McCreary District’s small

administrative staff and will prevent that staff from performing essential tasks necessary for McCreary District's day-to-day operations.

3. There is no statutory time period for the issuance of a ruling on McCreary District's application.

4. This motion is not made for purposes of delay.

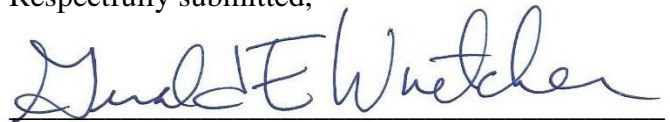
5. Permitting McCreary District an additional 17 days to respond to the Request for Information will not prejudice the Commission, any other party or the public.

6. In its Order of June 19, 2017, the Commission deviated from 807 KAR 5:001, Section 8 by requiring the filing of an original and six copies in paper medium of any paper filed in this matter. Commission Staff's request for an original and ten paper copies of McCreary District's response is in conflict with that Order.

WHEREFORE, McCreary County Water District requests that the Commission extend the time period for responding to Commission Staff's First Request for Information to November 10, 2017 and permit McCreary District to submit only an original and six copies in paper medium of its response to Commission Staff's First Request for Information.

Dated: October 13, 2017

Respectfully submitted,



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Counsel for McCreary County Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that McCreary District's October 13, 2017 electronic filing of this Application is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Commission on October 13, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and six copies of this Motion in paper medium will be delivered to the Commission on or before October 17, 2017.

A handwritten signature in blue ink, reading "Gerald E. Wuetcher", written over a horizontal line.

Gerald E. Wuetcher