

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

WILLIAM C. HILL)	
)	
COMPLAINANT)	CASE NO.
)	2017-00316
v.)	
)	
MUHLENBERG COUNTY WATER DISTRICT)	
)	
DEFENDANT)	

**COMPLAINANT’S RESPONSE TO
MUHLENBERG COUNTY WATER DISTRICT’S
MOTION FOR EXTENSION OF TIME**

Comes now the Complainant, William C. Hill (“Mr. Hill”), by counsel, and for his Response to the Motion filed herein by Muhlenberg County Water District (the “Water District”) requesting an extension of time to respond to requests for information propounded in this case, respectfully states as follows:

Mr. Hill originally submitted his Complaint in this matter on July 26, 2017, following years of attempting to obtain service from the Water District. After a formal prehearing conference held July 5, 2018, the Commission entered an Order on July 9, 2018, that, *inter alia*, directed the parties to respond to requests for information by August 8, 2018. Mr. Hill’s responses are tendered contemporaneously herewith.

In its Motion, the Water District requested an additional twenty-one (21) days, *to wit*, until August 29, 2018, to file its responses to requests for information. While Mr. Hill recognizes that

certain of the requests to which the Water District must respond are necessarily detailed, an extension of three (3) weeks (nearly doubling the time already given to respond) is excessive. The existing procedural schedule requires supplemental requests for information to be propounded by September 4, 2018 (with responses by September 14, 2018), as well as any and all depositions to be conducted by September 21, 2018. Clearly, extending even slightly the deadline by which the Water District must respond to Mr. Hill's and the Commission Staff's Initial Requests for Information, and certainly extending it until August 29, 2018, will unduly burden Mr. Hill and substantially impact his ability to obtain timely and appropriate relief in this proceeding. If absolutely necessary, Mr. Hill is reasonably agreeable to a ten (10) day extension of time for the Water District to complete its responses (assuming, of course, the Water District's responses are responsive and complete once obtained), but any longer extension is patently objectionable.

Finally, and though a fact likely not lost on the Commission, Mr. Hill did not join in Muhlenberg County Water District's Motion and respectfully disagrees with the Water District's characterization as to the status of the parties' settlement negotiations. While the Water District contends that its requested extension of time will "enable Muhlenberg District and Mr. Hill to resolve any details still in dispute," Mr. Hill and the Water District remain some distance apart and Mr. Hill desires that discovery be completed (facts communicated by the undersigned in advance of the Water District's Motion). In any event, the Water District's requested relief should be denied and this matter should move expeditiously towards a hearing.

This 8th day of August, 2018.

Respectfully submitted,



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CERTIFICATE OF SERVICE AND FILING

The undersigned certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on August 8, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and one (1) copy in paper medium of this document will be filed with the Commission within two (2) business days of the electronic filing.

The undersigned further certifies that, in accordance with 807 KAR 5:001, Section 4(8), this document is being contemporaneously provided via electronic mail to:

Hon Damon R. Talley
Hon. Mary Ellen Wimberly
Hon. Gerald E. Wuetcher
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Hon. Harold M. Johns
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This 8th day of August, 2018.



Counsel for Complainant