

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)
SOUTHERN WATER AND SEWER)
DISTRICT FOR AN ALTERNATIVE) CASE NO. 2018-00230
RATE ADJUSTMENT)

MOTION FOR CONTINUANCE

Comes the Southern Water and Sewer District (“Southern”), by and through counsel, and moves the Commission for a Continuance to postpone the hearing date of December 18, 2018 at 9 a.m.

The Commission has requested the hearing to consider indebtedness and water loss issues. In support of this Motion, Southern states the following:

1. Randal Strobo, undersigned and lead counsel for Southern, is unavailable due to the death of his father on Friday, December 14, 2018;
2. Clay Barkley, secondary counsel for Southern, is unavailable due to a health issue with his special needs child;
3. Two necessary witnesses are also likely unavailable for the hearing:
 - a. Danny Stinson is an employee of the Kentucky Rural Water Association. Mr. Stinson has been working with Southern to formulate a plan and address water loss issues. Mr. Stinson has been subpoenaed in a separate case and is unavailable on December 18, 2018;
 - b. Paula Gail Johnson, Southern’s Board Chair, may be unavailable for the hearing while she attends to her mother, who was recently hospitalized.

Southern respectfully requests a short continuance to accommodate the circumstances outlined above.

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

Respectfully submitted,

/s/ Randal A. Strobo

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CERTIFICATE OF SERVICE

It is hereby certified that a true copy hereof was filed with the Commission pursuant to 807 KAR 5:001, Section 6, and constituent with 807 KAR 5:001, Section 4(8)(d)(3) on the other parties of record this 16th day of December, 2018, to the following:

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