

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

Electronic Proposed Acquisition by Bluegrass)
Water Utility Operating Company, LLC and)
the Transfer of Ownership and Control of)
Assets by: P.R. Wastewater Management, Inc.;) No. 2019-00104
Marshall County Environmental Services LLC;)
LH Treatment Company, LLC; Kingswood)
Development, Inc.; Airview Utilities, LLC;)
Brocklyn Utilities, LLC; Fox Run Utilities,)
LLC; and, Lake Columbia Utilities, Inc.)

**Applicants’ Motion for Extension of Time
to Respond to Attorney General’s Initial Data Requests**

Bluegrass Water Utility Operating Company, LLC (“Bluegrass Water”) P.R. Wastewater Management, Inc., Marshall County Environmental Services LLC, LH Treatment Company, LLC, Kingswood Development, Inc., Airview Utilities, LLC, Brocklyn Utilities, LLC, Fox Run Utilities, LLC, and Lake Columbia Utilities, Inc. (collectively, “Applicants”), hereby move for an extension of time by which to respond to the Attorney General’s Initial Data Requests. In support of this Motion, the Applicants state as follows:

1. Pursuant to ¶5 of the Commission’s May 9, 2019 scheduling order, the deadline for the Applicants’ Response to initial Requests for Information is May 31, 2019.
2. Applicants are in need of additional time to prepare appropriate responses and verify several of the remaining Initial Data Requests (Nos. 10-13, 15-16).
3. On May 31, 2019, Applicants’ counsel and the AG representative in this matter discussed Applicants’ need for an extension to respond to the remaining data requests, and the AG agreed to such an extension, subject to the condition that for any response filed by

Applicants after the 5/31/19 deadline, the AG shall be allowed an extension for the same number of workdays after the 6/7/19 supplemental information request deadline by which to serve follow-up requests relating to the delayed response.

4. This extension would allow both Applicants and the AG to fully satisfy their obligations in responding to the requests for information and/or serving supplemental information requests in time for the hearing to be scheduled in the Commission's investigation of the proposed acquisition and transfer.

WHEREFORE, Applicants respectfully request that the Commission grant an extension for Applicants to respond to certain of the AG's initial data requests, and an extension for the AG to then file supplemental information requests thereto.

Respectfully submitted,

/s/ Kathryn A. Eckert

Katherine K. Yunker

kyunker@mcbayerfirm.com

Kathryn A. Eckert

keckert@mcbayerfirm.com

MCBRAYER PLLC

201 East Main Street; Suite 900

Lexington, KY 40507-1310

859-231-8780

fax: 859-231-1175

Attorneys for Movants