COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE WATER SERVICE RATES OF PRINCETON WATER AND WASTEWATER COMMISSION

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Case No. 2019-00444

MOTION FOR LEAVE TO FILE DATA REQUESTS AFTER DEADLINE

Princeton Water and Wastewater Commission ("PWWC"), by counsel, respectfully requests leave to file data requests to Caldwell County Water District and Lyon County Water District after the deadline. In support of its motion, PWWC states as follows:

In its February 21, 2020, scheduling order, the Commission set a filing deadline of Friday, April 3, 2020, for requests for information to Intervenor. The undersigned counsel inadvertently missed that deadline. Counsel has identified a flaw in his calendar system used while working remotely due to the current state of emergency, and will aim to cure that problem to ensure future deadlines are not inadvertently missed.

Caldwell County Water District and Lyon County Water District should not be unfairly prejudiced by the filing of these data requests two days after the deadline and before the next business day after the deadline. The requests are not cumbersome or voluminous. To the extent that the Water Districts need a commensurate extension to file responses to these data requests, PWWC will not object to such an extension.¹

Accordingly, PWWC respectfully requests leave from the Commission to file these data requests after the deadline.

¹ Due to the timing of the filing, counsel for PWWC has not consulted with counsel for the Water Districts to determine whether they would be opposed to this motion.

Respectfully submitted,

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ATTORNEYS FOR PRINCETON WATER AND WASTEWATER COMMISSION

CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8(7), this is to certify that the April 5, 2020, electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on April 5, 2020; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and a copy of the filing will be filed with the Commission within 30 days after the lifting of the emergency, as discussed in Case No. 2020-00085.

M. TAN (

Counsel for PWWC