

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC EMERGENCY DOCKET)
RELATED TO THE NOVEL CORONAVIRUS) CASE NO. 2020-00085
COVID-19)

**MOTION FOR EXTENSION OF TIME TO RESPOND
TO COMMISSION STAFF REQUEST FOR INFORMATION**

Green River Valley Water District (“Green River District”) moves for an additional 14 days in which to respond to the Public Service Commission Staff’s (“Commission Staff”) Request for Information dated June 23, 2020.

In support of its motion, Green River District states:

1. On June 23, 2020, Commission Staff issued in this proceeding to 19 water utilities¹ for a request information related to certain aspects of their operations and the effect of the Public Service Commission’s Order of March 16, 2020 in this proceeding on those operations. This request contains 16 requests (38 requests if sub-parts are considered) that in some instances required the review and compilation of information extending over a three and one-half-year period. Commission Staff has requested that this information be submitted to the Commission no later than July 7, 2020.

2. The request allows Green River District only nine business days in which to compile that requested information and place into the required format. (July 3 is a federal and state holiday.)

¹ The water utilities subject to this request were water districts and water associations. In a separate request, Commission Staff requested the same information from an investor-owned water utility that provides water and wastewater service.

3. Green River District has a limited number of office personnel who are sufficiently familiar with and understand Green River District's record systems and practices to compile the requested information and prepare Green River District's response. To compile and assemble thorough and accurate responses to Commission Staff's Request with the allotted time period, these employees would have to be diverted from their present duties and devote their full attention solely to preparing the responses. These employees perform duties that are essential to the functioning of the Water District and have a limited amount of time in which they can devote to compiling the requested information. Diverting these employees from their primary duties to devote their sole attention to preparing responses to Commission Staff's requests would significantly disrupt Green River's operations.

4. To avoid significant disruption to its operations, Green River District requires at least an additional 16 days in which to respond to Commission Staff's Request for Information.

5. This request is made in good faith and not for purposes of delay.

WHEREFORE, Green River County Water District requests an extension of time until at least July 23, 2020 in which to submit a response to Commission Staff's Request for Information dated June 23, 2020.

Dated: June 29, 2020

Respectfully submitted,

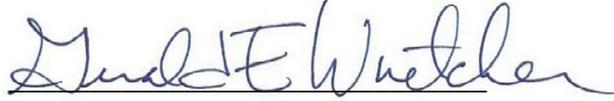


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Counsel for Green River County Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Green River County Water District's electronic filing of this Motion is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Public Service Commission on June 29, 2020; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that that within 30 days following the termination of the state of emergency declared in Executive Order 2020-215, this Notice of Intent in paper medium will be delivered to the Public Service Commission.

A handwritten signature in blue ink that reads "Gerald E. Wuetcher". The signature is written in a cursive style with a horizontal line underneath the name.

Gerald E. Wuetcher