

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**

Hyden-Leslie County Water District (“Hyden-Leslie 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, Hyden-Leslie District states:

1. On June 23, 2019, 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 Hyden-Leslie 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. Hyden-Leslie District's general manager will be the primary person compiling the requested information and preparing Hyden-Leslie District's response. Other Hyden-Leslie District employees lack sufficient familiarity and understanding of Hyden-Leslie District's record systems and practices to assist in the compilation of the requested information or have mission essential duties from which they cannot be diverted.

4. Hyden-Leslie District currently has an application for rate adjustment pending before the Public Service Commission.² Pursuant to the Public Service Commission's Order of June 18, 2020 in that proceeding, Hyden-Leslie District must respond no later than July 6, 2020 to 23 requests for information (42 requests if sub-parts are considered), that in some instances required the review and compilation of information extending over a five-year period.

5. For the same reasons noted above, Hyden-Leslie District's general manager will be the primary person compiling the requested information and preparing Hyden-Leslie District's response.

6. Given the amount of information requested in both proceedings and the amount of effort required to compile and assemble thorough and accurate responses, Hyden-Leslie District requires at least an additional 14 days in which to respond to Commission Staff's Request for Information.

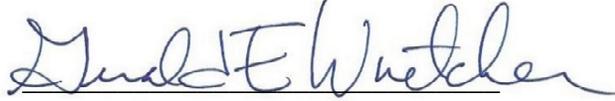
7. This request is made in good faith and not for purposes of delay.

WHEREFORE, Hyden-Leslie County Water District requests an extension of time until at least July 21, 2020 in which to submit a response to Commission Staff's Request for Information dated June 23, 2020.

² *Electronic Application of Hyden-Leslie County Water District for an Alternative Rate Adjustment*, Case No. 2020-00141 (Ky.PSC)

Dated: June 29, 2020

Respectfully submitted,

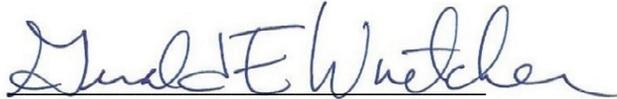


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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Hyden-Leslie 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.



Gerald E. Wuetcher