

**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 six days, or until July 27, 2020, 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 utilities<sup>1</sup> 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, but subsequently extended the time to respond until July 21, 2020.

2. Despite the grant of additional time, Hyden-Leslie District has been unable to prepare its response to Commission Staff’s Request. Hyden-Leslie District’s general manager is the primary person compiling the requested information. Other Hyden-Leslie District employees lack sufficient familiarity and understanding of Hyden-Leslie District’s record systems and

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<sup>1</sup> 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.

practices to assist in the compilation of the requested information or have mission essential duties from which they cannot be diverted. Hyden-Leslie District's General Manager was not able to devote his attention to the Request in this proceeding until completion of responses to Commission Staff requests for information in Case No. 2020-00141. His other responsibilities and duties as General Manager have also restricted that time that he has available to prepare a response to the Request.

3. Additionally, Hyden-Leslie District's efforts to assemble the requested information has been hampered by old billing and records information systems that were not designed to provide the requested information and do not permit the easy transfer of information. A significant portion of the requested information must be assembled manually.

4. Hyden-Leslie District respectfully requests an additional 6 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**, Hyden-Leslie County Water District requests an extension of time until July 27, 2020 in which to respond to Commission Staff's Request for Information dated June 23, 2020.

Dated: July 21, 2020

Respectfully submitted,

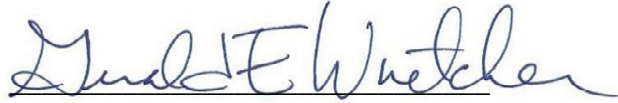


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*Counsel for Hyden-Leslie County Water District*

## 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 July 21, 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 Motion 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