COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC EMERGENCY DOCKET)RELATED TO THE NOVEL CORONAVIRUS)COVID-19)

MOTION FOR EXTENSION OF TIME

Ohio County Water District ("Ohio District") moves for an extension of time until February 1, 2021 to submit its responses to Commission Staff's Second Request for Information. In support of its Motion, Ohio District states:

1. On December 21, 2020, Commission Staff issued its Second Request for Information to Ohio District in this matter.

2. Shortly after this request was issued, Ohio District experienced significant changes in its staff. Its General Manager, Walt Beasley retired on December 31, 2020. Its Office Manager, Vicki Vincent cease to be an Ohio District employee earlier this month. Mr. Beasley and Ms. Vincent were responsible for preparing Ohio District's response to Commission Staff's First Request for Information in this matter.¹ When preparing and filing its response to Commission Staff's First Request for information, Ohio District did not retain or seek the assistance of legal counsel.

3. With the departure of Mr. Beasley and Ms. Vincent, no person at Ohio District was aware of Commission Staff's Second Request for Information. Ohio District only learned of the outstanding request this morning.

¹ Mr. Beasley is designated the contact for all correspondence sent from the Public Service Commission to Ohio District. All correspondence is sent to Mr. Beasley's personal e-mail account.

4. Ohio District requests 13 additional days in which to respond to Commission Staff's Request.² This additional time is required as the only office staff who can access and process the information necessary to prepare a response is currently out on sick leave and is being tested for a possible Covid-19 infection. Accessing the information, therefore, may require more time than usual.

5. This request is made in good faith and is not intended to delay this proceed or impede the Commission's investigation.

WHEREFORE, Ohio County Water District requests that the Commission enter an Order extending the time for responses to Commission Staff's Second Request for Information to February 1, 2021.

Dated: January 19, 2021

Respectfully submitted,

Allan

Gerald E. Wuetcher Stoll Keenon Ogden PLLC 300 West Vine Street, Suite 2100 Lexington, Kentucky 40507 Telephone: (859) 231-3017 Fax: (859) 259-3517 gerald.wuetcher@skofirm.com

Counsel for Ohio County Water District

² Ohio District assumes that as state government offices were closed on January 18, 2021 for a legal holiday, the final day for submission of the requested information is today, January 19. *See* KRS 446.030.

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Ohio 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 January 19, 2021; 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.

Gerald E. Wuetcher