

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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

MOTION FOR EXTENSION OF TIME

The Northern Kentucky Water District (NKWD), by counsel, hereby respectfully requests an extension of time until January 22, 2021, to respond to the Commission Staff's Second Request for Information issued related to this matter on December 28, 2020.

Commission Staff's Second Request for Information ("Second Request") directs NKWD to provide updated information regarding "the percent of customers, by class, that pay on time for each month in 2020, including for the month of December." This request was a follow-up to Commission Staff's First Request for Information, Item 9, which NKWD previously responded as required in 2020. The Second Request is due on January 18, 2021.

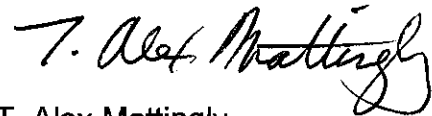
On January 18, 2021, while reviewing the responsive information, NKWD discovered an error in the data mining process that resulted in inaccurate information being produced. The error appears to be a result of a conversion from a prior billing software. To provide the correct information, NKWD staff must repeat the data mining process and confirm that the updated information is correct, which will take substantial time.

In order to allow NKWD sufficient time to submit complete and accurate

information, it is seeking a brief extension of the deadline by which its response must be provided. It appears no prejudice or undue delay will result from this extension of time, and having shown good cause, NKWD respectfully requests until January 22, 2021, to respond to the Commission Staff's Second Request for Information.

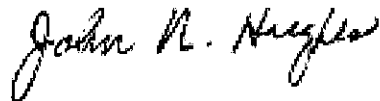
This the 18th day of January, 2021.

SUBMITTED BY:



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