COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

PSC Case 2020-121

In Re Matter of: ELECTRONIC SOUTHERN WATER AND SEWER DISTRICT METER REPLACEMENT SURCHARGE MONITORING

MOTION FOR AN ADDITIONAL 15 DAYS TO

ANSWER DATA REQUEST

Comes Southern Water and Sewer District "Southern", by and through counsel, and for its motion for an additional 15 days to respond to the December 18, 2020 data request states as follows;

Southern's attorney was not served with the December 18, 2020 data request until December 21, 2020 due to the fact that said attorney was not added to the service list for this case. Additionally, due to the Covid 19 pandemic and the holiday season, many vendors and other people/entities have been unavailable to assist in gathering the necessary information required to answer said data request.

Wherefore, Southern hereby requests an additional 15 days to file the answers to the December 18, 2020 data request.

Respectfully Submitted on December 31, 2020,

<u>/s/ Steven Bailey</u> Steven P Bailey, JD/MBA Counsel for Southern Water & Sewer District Bailey Law Office, PSC 181 E Court Street Prestonsburg, KY 4153 (606) 263-4913