

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF WATER)
SERVICE CORPORATION OF KENTUCKY FOR A) CASE NO. 2020-00160
GENERAL ADJUSTMENT IN EXISTING RATES)

**ATTORNEY GENERAL’S RESPONSE TO WATER SERVICE CORPORATION OF
KENTUCKY’S MOTION FOR EXTENSION OF TIME TO RESPOND TO
DATA REQUESTS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and hereby submits his response to Water Service Corporation of Kentucky’s (“Water Service Kentucky or the Company”), Motion for Extension of Time to Respond to Data Requests (“Motion for Extension of Time”), which was filed with the Commission on August 17, 2020. In the Motion for Extension of Time, Water Service Kentucky asserts that due to the voluminous nature of the requests and the substantial time required to prepare responses, the Company requests a two-week extension through September 2, 2020, to provide the responses.¹ Should the Commission decide to grant Water Service Kentucky’s Motion for Extension of Time, in order to ensure adequate time for all parties to litigate the pending case the Attorney General requests Water Service Kentucky to extend the date that the Company may implement its proposed rates subject to refund by two weeks as well, which is commensurate with the requested two-week extension of time to file responses to the discovery requests.²

¹ Water Service Kentucky’s Motion for Extension of Time at 1.

² In Case No. 2018-00208, Water Service Kentucky filed a Motion to Reschedule the Evidentiary Hearing on November 5, 2018, and stated in a supplemental filing later the same day, that if the Commission agreed to reschedule the hearing then Water Service Kentucky would agree to not implement its proposed rates subject to refund earlier than February 1, 2019. The Commission issued an Order on November 6, 2018, and found that good cause existed to reschedule the hearing, and good cause also existed for Water Service Kentucky to agree to not implement its proposed rates subject to refund earlier than February 12, 2019, because it was a time commensurate with the extension of the rescheduled hearing date.

WHEREFORE, the Attorney General submits this Response to Water Service Kentucky's Motion for Extension of Time, and respectfully requests for Water Service Kentucky to extend the date that the Company may implement its proposed rates by an additional two weeks.

Respectfully submitted,

DANIEL J. CAMERON
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Certificate of Service and Filing

Pursuant to the Commission's Orders dated March 16, 2020 and March 24, 2020, in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the foregoing was served by e-mail to the following. A physical copy of the filing will be submitted to the Commission once the State of Emergency has ceased.

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This 19th day of August, 2020.

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