

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

*Electronic* Application of Bluegrass )  
Water Utility Operating Company, LLC ) Case No. 2020-00290  
for an Adjustment of Rates and Approval )  
of Construction )

---

**Applicant’s Motion for Extension of Time  
to Respond to Staff’s Third Request for Information**

---

Bluegrass Water Utility Operating Company, LLC (“Applicant”) hereby moves for an extension of time by which to respond to certain requests in Staff’s Third Request for Information. In support of this Motion, the Applicant states as follows:

1. Pursuant to the Commission’s February 8, 2021 Order Appendix, the deadline is March 22, 2021 (today), for the Applicant’s Response to an added round of supplemental requests for information to have been propounded on or before March 8, 2020.
2. Applicant has worked diligently to provide full answers to the requests propounded by the Joint Intervenors and Commission Staff. Applicant anticipates, however, that it will need additional to prepare appropriate and verify responses to a number of data requests in the Commission Staff’s Third Request for Information. Additional time is likely to be needed for the responses to Third Request Nos. 3-4, 7-8, 10-14, 18-20, and 22-23.
3. Rather than file partial or “place-holder” responses in need of immediate supplementation, Applicants requests an extension to and including Friday, March 26, 2021, in which to file responses to any of Staff’s Third Requests for which no response is filed today.

4. This extension would allow the Applicant to fully and efficiently respond to the requests for information, without causing any delay in the existing schedule or to the hearing to be scheduled in the Commission's investigation of the proposed rate adjustment.

WHEREFORE, Applicants respectfully request that the Commission grant an extension until Friday, March 26, 2021, for Applicant to file and serve responses to any request remaining after today of the Staff's Third Request for Information.

Respectfully submitted,

*/s/ Kathryn A. Eckert*

Katherine K. Yunker  
[kyunker@mcbayerfirm.com](mailto:kyunker@mcbayerfirm.com)

Kathryn A. Eckert  
[keckert@mcbayerfirm.com](mailto:keckert@mcbayerfirm.com)

MCBAYER PLLC  
201 East Main Street; Suite 900  
Lexington, KY 40507-1310  
859-231-8780  
fax: 859-231-1175

*Attorneys for Applicant Bluegrass Utility  
Operating Company, LLC*