

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

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

**Applicant’s Motion for Extension of Time to File
Response to HOA’s Motion for Leave to Intervene**

Comes now Bluegrass Water Utility Operating Company, LLC (hereinafter “Bluegrass”) and respectfully requests a brief extension of time to file a response to the Homestead Home Owners Association, Inc.’s (hereinafter “HOA”) Motion for Leave to Intervene. In support of this Motion, Bluegrass hereby states as follows:

1. Bluegrass submitted its Application to the Commission in the instant matter on September 30, 2020, for an adjustment of rates and approval of construction. The fully-forecasted test year and sewer rates proposed are based on service to its previously acquired systems from Case Nos. 2019-00104 and 2019-00360, as well as those systems approved but not yet acquired in Case No. 2020-00028, and those not yet approved for acquisition in Case No. 2020-00297.
2. The Commission issued a deficiency letter (“10/30/20 Letter”) on October 30, 2020, along with an Order (“10/30/20 Order”) outlining additional information and steps related to the identified deficiencies.
3. Bluegrass submitted a Motion to Deviate from Notice Requirements on November 18, 2020. Bluegrass also submitted its Notice of Filing to Cure Deficiencies on November 19, 2020, along with Supplements to the Application regarding the notice to customers in Case Nos. 2020-00028 and 2020-00297. No ruling has been made on the Motion to

Deviat, and the Commission has not yet ruled on whether and as of what date the Application is deemed filed in this matter.

4. The HOA filed its motion for leave to intervene on November 23, 2020. Pursuant to 807 KAR 5:001 Section 5(2), Bluegrass has only seven (7) days to file its Response.

5. As the time period prescribed by the regulations for responding to the HOA Motion runs through the Thanksgiving holiday and subsequent weekend, Bluegrass hereby requests an extension of seven (7) days by which to respond to the HOA Motion. This will allow Bluegrass fair and full opportunity to respond. As no scheduling deadlines have been ordered in the case, and the Application has not yet been deemed to be filed, such a brief extension would not disturb or disrupt the matter.

WHEREFORE, Bluegrass respectfully requests an Order allowing an additional seven (7) days, until and including Monday, December 7, 2020, for it to respond to the HOA's Motion for Leave to Intervene.

Respectfully submitted,

/s/ Kathryn A. Eckert

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