

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

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

**Applicant’s Motion for Extension of Time to
Respond to Motions to Intervene**

Comes now Bluegrass Water Utility Operating Company, LLC (hereinafter “Bluegrass”) and respectfully requests an extension of time to respond to recently-filed Motions for Leave to Intervene and to respond to any additional motions to intervene that might be filed in this case before January 4, 2021. In support of this Motion, Bluegrass hereby states as follows:

1. On December 18, 2020, the Bluegrass Application was deemed filed as of November 19, 2020, and the proposed rates suspended for six months from that date. On December 23, 2020, the Commission issued a scheduling Order for the case that, in relevant part, sets January 6, 2021, as the last date for requests for intervention to be accepted.
2. On December 18, 2020, Deer Run Estates Homeowners Association, Inc. (“Deer Run”) filed a Motion for Leave to Intervene. On December 23, 2020, Longview Homeowners Association, Inc. (“Longview”) filed a Motion for Leave to Intervene.
3. Pursuant to 807 KAR 5:001 Section 5(2), Bluegrass has only seven (7) days to file a response. This 7-day period encompasses two state holidays for both the Deer Run and the Longview Motions, and falls during a period when many of the personnel who would contribute to the response and its filing are on break until January 4, 2021. Any additional motions to intervene filed over the next 10 days will have similarly disadvantaged 7-day response periods.

4. Bluegrass therefore requests an extension to and including January 5, 2021, in which to file a response to the Deer Run and Longview Motions and any other motions to intervene filed on or before December 30, 2021, and an extension to and including January 11, 2021, for any motion filed during the period December 31, 2021 — January 3, 2021. This allowance for Bluegrass to prepare and file responses after the end-of-the-year holidays should not disturb or disrupt the schedule established today by the Commission.

WHEREFORE, Bluegrass respectfully requests an Order granting it an extension of time to January 5, 2021 to respond to the Deer Run and Longview Motions, and to the dates requested herein for any other motions to intervene that may be filed before January 4, 2021.

Respectfully submitted,

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