

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC HYDEN-LESLIE COUNTY)
WATER DISTRICT’S UNACCOUNTED-FOR) CASE NO. 2020-00340
WATER LOSS REDUCTION PLAN,)
SURCHARGE AND MONITORING)

MOTION FOR LEAVE TO FILE RESPONSE OUT OF TIME

Pursuant to 807 KAR 5:001, Section 5, Hyden-Leslie County Water District (“Hyden-Leslie District” or “the District”) moves for leave to file its Response to Commission Staff’s Second Request for Information out of time. In support of its Motion, Hyden-Leslie District states:

1. On May 9, 2024, Commission Staff issued its Second Request for Information in this matter. This request provided that Hyden-Leslie District was to submit a response no later than May 28, 2024.

2. Hyden-Leslie District’s General Manager, who was responsible for assembling the requested information and is the responding witness, work diligently to prepare the District’s response. Because its counsel was out-of-the office during the week of May 19, 2024, the District planned to finalize and file its response with the Public Service Commission on May 28, 2024.

3. On May 26, 2024, the Leslie County, Kentucky area experienced severe thunderstorms causing extensive power outages, damaging District facilities essential to the provision of water service, and disrupting water service to the District’s customers. From that day to late evening on May 28, 2024, the District General Manager’s full attention was devoted to the restoration of water service. He was unavailable to confer with counsel to finalize the response for filing with the Public Service Commission. (As of the filing of this Motion, portions of Leslie

County are still without electric power and several of the District's distribution facilities are currently being operated with backup power systems.) The District was able to finalize its response on May 29, 2024.

4. The District requests leave to file its response to Commission Staff's request out of time.

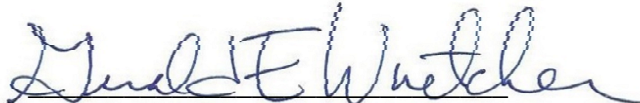
5. This request is made in good faith and not for purposes of delay. Its inability to submit the response within the required time period was due to unexpected events beyond its control.

6. The District's one-day delay in submitting the response will not adversely affect the Public Service Commission's review of the operation of the District's unaccounted-for water loss surcharge or the District's present plans to address its unaccounted-for water loss.

WHEREFORE, Hyden-Leslie County Water District requests that the Public Service Commission grant it leave to file its Response to Commission Staff's Second Request for Information out of time and accept that Response for filing.

Dated: May 29, 2024

Respectfully submitted,

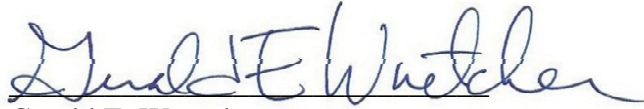


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Counsel for Hyden-Leslie County Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8 and the Public Service Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was electronically transmitted to the Public Service Commission on May 29, 2024 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

A handwritten signature in blue ink that reads "Gerald E. Wuetcher". The signature is written in a cursive style with a horizontal line underneath the name.

Gerald E. Wuetcher