

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF WEST)
SHELBY WATER DISTRICT FOR A RATE) CASE NO. 2021-00241
ADJUSTMENT PURSUANT TO 807 KAR 5:076)**

MOTION FOR EXTENSION OF TIME

West Shelby Water District (“West Shelby District”) moves for a 30-day extension of time through October 22, 2021 in which to file its Response to the Kentucky Public Service Commission (“Commission”) Staff’s First Request for Information (“Information Request”). In support of this Motion, West Shelby District states:

1. In its August 10, 2022 Order setting forth the procedural schedule for this case, the Commission stated that “West Shelby District shall file responses to requests for information on later than 9/22/2021.”

2. Commission Staff issued the Information Request on September 8, 2021, which consisted of 21 questions with multiple subparts.

3. To say that the Office Manager of West Shelby District was **overwhelmed** when she received the Information Request is an **understatement**. West Shelby has not previously filed an ARF case nor a general rate case since the Office Manager has been employed by West Shelby District. She had no idea that

filing the ARF case as Ordered by the Commission would generate so much work by the Office Manager.

4. West Shelby District has five (5) full-time employees and one (1) part-time employee. Of these, three (3) full-time employees are “outside” employees and work in the distribution system. Two (2) full-time employees, which include the Office Manager, and one (1) part-time employee work in the office. West Shelby District was already “short-handed” and was seeking to hire another full-time employee before the Commission Staff issued its Information Request.

5. West Shelby District’s Office Manager has been in quarantine because of COVID exposure since receiving the Commission Staff’s Information Request. It has only been two (2) days since she was able to return to the office and commence working on collecting the information and documents necessary to respond to the Information Request.

6. Since returning to the office on Monday, September 20, 2021, the Office Manager has contacted West Shelby District’s accountant and engineer to assist her in responding to the Information Request. At West Shelby District’s Board meeting on September 16, 2021, the Board authorized the Office Manager to retain the services of Stoll Keenon Ogden to assist it with the ARF case. At 9:48 pm on September 16, 2021, she sent Mr. Talley an email memo requesting his firm’s assistance in this matter. The Office Manager followed-up early the next morning

by calling Mr. Talley and explaining the need for Stoll Keenon Ogden's services in more detail.

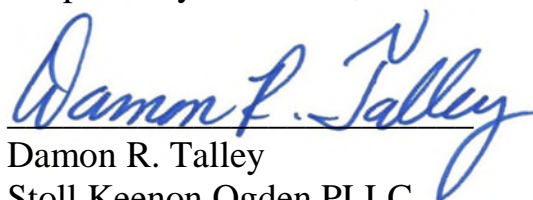
7. West Shelby District reasonably believes that the additional time requested in this Motion will enable its staff to fully answer the Information Request by October 22, 2021 while still responding to customer inquiries in a timely manner and performing other normal duties.

8. Based on the foregoing, good cause exists for the Commission to grant this extension. Extending the deadline for West Shelby District to file its Response to Commission Staff's Information Request to October 22, 2021 will allow West Shelby District sufficient time to prepare and file its Response.

WHEREFORE, West Shelby District respectfully requests that the Commission grant its request for an extension of time until October 22, 2021 in which to file its Response with the Commission.

Dated: September 22, 2021

Respectfully submitted,



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Counsel for West Shelby Water District

CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on September 22, 2021; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



Damon R. Talley