

**BEFORE THE PUBLIC SERVICE COMMISSION
COMMONWEALTH OF KENTUCKY**

**LOGAN TELEPHONE
COOPERATIVE, INC.,**

Complainant,

v.

**EAST LOGAN WATER
DISTRICT, INC.**

Defendant.

Case No. 2021-00248

MOTION FOR EXTENSION OF TIME

Pursuant to 807 KAR 5:001(5), Complainant Logan Telephone Cooperative, Inc. (“LTC”), by counsel, moves for an extension of time to February 18, 2022 to respond to the Commission Staff’s First Request for Information (“Requests”). In support of its motion, LTC states as follows.

The Commission Staff served its Requests on January 12, 2022 with responses due on January 28, 2022. LTC has worked diligently to provide complete and timely responses, however several of the Requests seek information that LTC will need to obtain from third-party contractors in order to provide complete responses.¹ LTC has attempted to gather all the necessary information from its contractors, but at this time it does not have sufficient information to fully respond to the Requests. Extending the response period will allow LTC to gather and thoroughly review the documents and information from its contractors and provide complete responses to the Requests.

¹ The locate requests and excavations described in LTC’s Complaint were primarily performed by third-party contractors, North Central Services and Floyd’s Equipment, through USDA/RUD contracts.

Defendant East Logan Water District has previously moved to extend its response date to the Commission Staff's First Request for Information from January 28, 2022 to February 18, 2022. LTC does not object to this extension. As the Commission Staff originally provided for the parties to serve responses on the same date, LTC would request the same extension of time to serve its responses to the Requests. This motion is made in good faith and not for purposes of delay.

WHEREFORE, LTC respectfully requests that the Commission enter an Order extending its time to respond to the Commission Staff's Requests.

DATED: January 25, 2022.

Respectfully submitted,

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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001(8) and the Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was transmitted to the Public Service Commission on January 25, 2022 and that no parties have been excused from electronic filing procedures.

/s/ Edward T. Depp
Edward T. Depp