

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

**In the Matter of:**

**ELECTRONIC INVESTIGATION INTO                    )**  
**LEDBETTER WATER DISTRICT CHARGING            ) CASE NO. 2021-00311**  
**UNAUTHORIZED RATES PURSUANT TO 807        )**  
**KAR 5:068    )**

**MOTION FOR EXTENSION OF TIME TO RESPOND**

Ledbetter Water District (“Ledbetter District”) moves for an extension of time until October 29, 2021 to respond to the Public Service Commission’s Order of August 4, 2021. In support of its Motion, Ledbetter District states:

1. On August 4, 2021, the Public Service Commission initiated this proceeding to investigate Ledbetter District’s alleged assessment of unauthorized rates and ordered Ledbetter District to respond within 20 days to the allegations contained in its Order.
2. Ledbetter District has not filed a response to the Order of August 4, 2021.
3. At the time of the issuance of the Order, Ledbetter District lacked legal counsel.
4. At the time of the Order’s issuance, Ledbetter District’s general manager had contracted the COVID-19 virus and was unable to attend to Ledbetter District’s official business.
5. Since the issuance of the August 4, 2021 Order, Ledbetter District’s general manager has written and telephoned Commission Staff regarding the Order and was advised that Ledbetter District should consult with and retain the services of an attorney to represent it in this proceeding.
6. In early October 2021, Ledbetter District requested that the undersigned represent it in this proceeding. After a due diligence inquiry, including conversations with Public Service

Commission Staff members, the undersigned agreed to do so. A representation agreement was executed and returned to the undersigned on October 19, 2021.

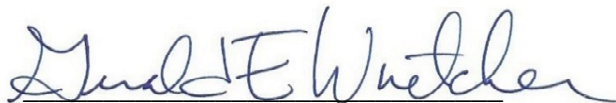
7. Ledbetter District's failure to timely respond to the Order of August 4, 2021 was the result of its officials' lack of knowledge and experience with Public Service Commission practice and procedure, its lack of legal counsel and its General Manager's inability to address water district business due to illness. Its failure to respond should not be interpreted as a lack of respect for the Public Service Commission or willful defiance of the Public Service Commission's authority. Ledbetter District apologizes to the Public Service Commission for its failure to timely comply with the Order of August 4, 2021.

8. The delay in responding to the Order of August 4, 2021 has not resulted in the continued violation of any statute or regulation or adversely affected the quality of Ledbetter District's service to the public or the rates or charges assessed to the public nor has it impeded or materially affected the Public Service Commission's investigation.

WHEREFORE, Ledbetter District respectfully requests that the Public Service Commission grant it an extension of time until October 29, 2021 to respond to the Order of August 4, 2021.

Dated: October 19, 2021

Respectfully submitted,



Gerald E. Wuetcher  
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*Counsel for Ledbetter Water District*

**VERIFICATION**

COMMONWEALTH OF KENTUCKY   )  
  ) SS:  
COUNTY OF LIVINGSTON         )

The undersigned, Alan Fox, being duly sworn, deposes and states that he is the General Manager of Ledbetter Water District and that he has personal knowledge of the matters set forth in this Motion, and the statements contained therein are true and correct to the best of his information, knowledge and belief.

*Alan Fox*

\_\_\_\_\_  
Alan Fox  
General Manager  
Ledbetter Water District

Subscribed and sworn to before me, a Notary Public in and before said County and State,  
this 10th day of October 2021.

*Paula Malone*

\_\_\_\_\_  
Notary Public

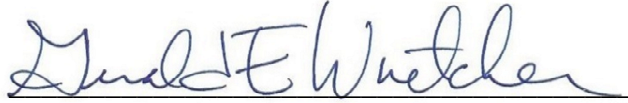
My Commission Expires: 12.22.2021

Notary ID: 592430



## 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 transmitted to the Public Service Commission on October 19, 2021 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, reading "Gerald E. Wuetcher", written over a horizontal line.

Gerald E. Wuetcher