COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:		
ELECTRONIC INVESTIGATION INTO THE)	
FINANCIAL AND OPERATING CAPACITY OF)	
RATTLESNAKE RIDGE WATER DISTRICT)	
NCLUDING RATTLESNAKE RIDGE WATER)	
DISTRICT AND ITS INDIVIDUAL)	CASE NO.
COMMISSIONERS, AND MANAGER DAVID)	2021-00340
GIFFORD FOR ALLEGED FAILURE TO COMPLY)	
WITH KRS 278.300 AS WELL AS POSSIBLE)	
VACANCIES ON THE BOARD OF)	
COMMISSIONERS OF RATTLESNAKE RIDGE)	
WATER DISTRICT	ĺ	

MOTION FOR ADDITIONAL TIME TO RESPOND TO COMMISSION STAFF'S EIGHTH REQUEST FOR INFORMATION TO RATTLESNAKE RIDGE WATER DISTRICT

Comes Rattlesnake Ridge Water District (RRWD), by and through Counsel, and respectfully requests that the Commission grant an extension of time in which to file the Response to this Eighth Request for information. As grounds herein, the Order was received late Friday afternoon on May 17, 2024. The Response is due May 28, 2024, less than six (6) working days given the Memorial Day holiday. Additionally, the manager, David Gifford, who will need to sign off on the Response, has a scheduled vacation beginning Friday, May 24, 2024 (which was scheduled well before the receipt of the current Order).

As the information requested is extensive and was prior to the current Manager or Assistant Manager being employed in their current positions, it will take time and research to find or determine much of the material requested. Further, RRWD has been in the process of providing information needed for the rate study and RRWD does not have the manpower to

dedicate one employee solely to secure the new information now requested without attending to other duties (for example, today one of the clerical employees is out and the assistant manager is having to fulfill her duties [taking payments, answering phones, etc.]).

RRWD would request that it be given an extension of time of thirty (30) days in which to file its Response to this Eighth Request for information. This request is not made for purposes of delay, but only to fully and accurately provide the information requested in a complete manner without having to piecemeal the information together.

DAVID GIFFORD, MANAGER RATTLESNAKE RIDGE WATER DISTRICT

Respectfully submitted.

DELORES WOODS BAKER Local Counsel RRWD 134 W Third St Maysville, KY 40156 606-564-7969 dwbaker@maysvilleky.net

CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion was served by postage prepaid, first class mail on May 21, 2024 to:

Lewis County Fiscal Court 122 Second Street Vanceburg, KY 41179 Elliott County Local Government P.O. Box 710 Sandy Hook, KY 41171 Carter County Fiscal Court 300 West Main Street Grayson, KY 41143

Lawrence County Fiscal Court 122 South Main Cross Street Louisa, KY 41230

Morgan County Office Building 450 Prestonsburg Street West Liberty, KY 41472

Mr. Jim Gazay Morgan County Judge Executive 450 Prestonsburg Street West Liberty, KY 41472

Mr. Phillip Carter Lawrence County Judge Executive P.O. Box 566 Louisa, KY 41230

And by email on May 21, 2024 to:

John Lewis, Elliott County Attorney: attorneyjohnlewis@yahoo.com

Brian Bayes, Carter County Attorney: bbayes@prosecutors.ky.gov

Ben Harrison, Lewis County Attorney: <u>bharrison@prosecutors.ky.gov</u>

Brandon Burton, Carter County Judge Executive: ccjudgeexecutive@gmail.com

George Sparks, Lewis County Judge Executive: George.sparks@lewiscountyky.gov

Myron Lewis, Elliott County Judge Executive: ejudge@mrtc.com

Johnny Osborne, Lawrence County Attorney: johnny@lcattorney.net

Myles Holbrook, Morgan County Attorney: Mholbrook@prosecutors.ky.gov

Respectfully submitted,

DELORES WOODS BAKER

Local Counsel RRWD 134 W Third St Maysville, KY 40156

606-564-7969