

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC INVESTIGATION INTO)
MILBURN WATER DISTRICT TO)
DETERMINE THE FEASIBILITY OF)
MERGER WITH A PROXIMATE UTILITY) CASE NO. 2021-00341
PURSUANT TO KRS 74.361 OR)
ABANDONMENT PURSUANT TO KRS)
278.020(6), KRS 278.021)

**MOTION FOR EXTENSION OF TIME TO RESPOND
TO COMMISSION STAFF’S SECOND REQUEST FOR INFORMATION**

Pursuant to 807 KAR 5:001, Section 5(1), Graves County Water District (“the District”) moves for an additional fourteen (14) days in which to respond to the Commission Staff’s Second Request for Information. In support of its motion, the District states:

1. On March 15, 2024, Commission Staff issued its Second Request for Information to the District. Commission Staff requested a response to the Request no later than March 29, 2024.
2. Graves District has contracted with Mayfield Electric and Water System (“MEWS”) for operations, maintenance and management services. Under this contract, MEWS is responsible for the District’s day-to-day operations and its management, accounting, and recordkeeping functions.
3. The MEWS employees whose assistance is necessary for the preparation of the response to Commission Staff’s Request for Information are unavailable until the week of April 1 due to previously scheduled vacations.
4. Additionally, the District’s auditing firm, whose assistance is required to answer some of the inquiries, has advised that it is unable to immediately assist the District in preparing its response and will require additional time to provide some of the requested information.

5. Graves District requests an additional 14 days, or until April 12, 2024, to respond to Commission Staff's Request for Information.

6. As there is no statutory deadline for completion of this proceeding, the requested extension will not unduly disrupt or delay this proceeding. To the extent that Commission Staff requires additional time to prepare a merger feasibility report and study, Graves District does not object to any adjustment in the existing procedural schedule resulting from the granting of its request for an extension of time.

7. This request is made in good faith and not for purposes of delay.

Dated: March 22, 2024

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on March 22, 2014 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.


Counsel for Graves County Water District