## **COMMONWEALTH OF KENTUCKY**

### **BEFORE THE PUBLIC SERVICE COMMISSION**

### In the Matter of:

ELECTRONIC INVESTIGATION INTO	)	
WHOLESALE WATER RATES	)	
CHARGED BY THE CITY OF	)	
CARLISLE TO SHARPSBURG WATER	)	CASE NO. 2021-00382
DISTRICT AND NICHOLAS COUNTY	)	
WATER DISTRICT PURSUANT TO	)	
KRS 278.200, KRS 278.160, KRS 278.180,	)	
KRS 278.190 AND 807 KAR 5:011	)	

#### MOTION FOR EXTENSION OF TIME

Nicholas County Water District ("Nicholas District") moves for an extension of time through February 7, 2022 in which to file its Response to the City of Carlisle's Post-Hearing Request for Information with the Kentucky Public Service Commission's ("Commission"). In support of this Motion, Nicholas District states:

1. Nicholas District is requesting a 14-day extension of time in which to prepare and file its Response to the City of Carlisle's Post-Hearing Request for Information (the "Response to Carlisle") because since receiving the information request, both of Nicholas District's two (2) office employees have contracted COVID-19 and have been out of the office for extended periods of time. Nicholas District only has two (2) employees who work in its office – its Office Manager, Monica Pryor, and one other employee. Ms. Pryor returned to work on Friday, January 21, 2022, on a limited basis and is working today. The other office

employee is still recovering from COVID-19, and was absent on Friday and today. It is not known when she will be able to return to work.

2. Nicholas District's Office Manager has been able to compile the information necessary to answer the Commission Staff's Post-Hearing Request for Information. Nicholas District's attorneys plan to file that Response today.

3. Unfortunately, because of the Office Manager's other duties and responsibilities (i.e. answering the phone, accepting payments from customers, and responding to customer requests), she has been unable to devote any time to compiling the information requested by Carlisle.

4. Nicholas District believes that good cause exists for the Commission to grant the requested extension. Furthermore, this Motion for an Extension is not being filed for purposes of delay.

5. Extending the deadline for Nicholas District to file its Response to Carlisle until February 7, 2022 should allow Nicholas District sufficient time to obtain and compile the information requested by Carlisle and prepare and file its Response to Carlisle.

WHEREFORE, Nicholas District respectfully requests that the Commission grant its request for an extension of time until February 7, 2022, in which to file its Response to Carlisle's Post-Hearing Request for Information.

- 2 -

Dated: July 24, 2021

Respectfully submitted,

Damon f. Jalley

Damon R. Talley Stoll Keenon Ogden PLLC P.O. Box 150 Hodgenville, KY 42748-0150 Telephone: (270) 358-3187 Fax: (270) 358-9560 damon.talley@skofirm.com

Mary Ellen Wimberly Stoll Keenon Ogden PLLC 300 West Vine Street, Suite 2100 Lexington, Kentucky 40507-1801 Telephone: (859) 231-3047 Fax: (859) 246-3647 maryellen.wimberly@skofirm.com

Counsel for Nicholas County 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 January 24, 2022; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

Damon R. Talley