

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

Electronic Application of Bluegrass Water Utility)
Operating Company, LLC for Certificates of)
Convenience and Necessity for Projects at the)
Herrington Haven Site)

Case No. 2022-00102

**Applicant’s Motion for Extension of Time
to Respond to Commission Staff’s Supplemental Data Requests**

Bluegrass Water Utility Operating Company, LLC (“Bluegrass” or “Applicant”), hereby moves for an extension of time by which to respond to the Commission Staff’s Second Request for Information. In support of this Motion, the Applicant states as follows:

1. Pursuant to the Appendix of the Commission’s April 8, 2022 scheduling order, the deadline for the Applicant’s Response to supplemental Requests for Information is June 16, 2022.
2. Applicant is in need of additional time to prepare appropriate responses and verify its Response to the supplemental data requests. Applicant is diligently working to complete the responses and multiple subparts; however, it has become apparent that additional time is needed to ensure that all responsive information can be presented to the Commission to assist with its review of this case. Therefore, Applicant requests an extension of 7 days, to be due on June 23, 2022.
3. This extension would allow the Applicant to fully satisfy its obligations in responding to the requests for information to assist the Commission with its investigation of the proposed construction certificate.

4. Pursuant to the Appendix of the Commission's April 8, 2022 scheduling order, the deadline for the Applicant to request a public hearing or submit a request for the matter to be decided based upon the written record is June 22, 2022.

5. Because the Applicant is seeking an extension for its response to supplemental data requests to June 23, 2022, the final deadline for Applicant to request a public hearing or in the alternative submit a request for the matter to be decided on the written record would also necessitate an extension. Applicant requests an extension of 7 days of this final deadline, to be due on June 29, 2022.

6. This extension would allow the Applicant to fully satisfy its obligations in complying with the April 8, 2022 scheduling order and assisting the Commission with its investigation of the proposed construction certificate.

WHEREFORE, Applicant respectfully requests that the Applicant grant an extension of 7 days, up until and on June 23, 2022, for Applicant to respond to Commission Staff's Second Request for Information, and an extension of 7 days, up until and on June 29, 2022, for Applicant to request a public hearing or submit a request for the matter to be decided based upon the written record.

Respectfully submitted,

/s/ Kathryn A. Eckert

Katherine K. Yunker
kyunker@mcbayerfirm.com
Kathryn A. Eckert
keckert@mcbayerfirm.com
MCBRAYER PLLC
201 East Main Street; Suite 900
Lexington, KY 40507-1310
859-231-8780
fax: 859-960-2917
*Counsel for Bluegrass Water Utility
Operating Company*