

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF)
WOOD CREEK WATER DISTRICT) CASE NO. 2022-00145
FOR ADJUSTMENT OF RATES)**

MOTION FOR EXTENSION OF TIME

Pursuant to 807 KAR 5:001, Section 5, Wood Creek Water District (“Wood Creek District”) moves for an additional 14 days in which to respond to Commission Staff’s First Request for Information.

In support of its Motion, Wood Creek District states:

1. On July 8, 2022, Commission Staff issued to Wood Creek District its First Request for Information. This request is extensive; contains 43 specific requests, several of which contain numerous subparts; and requires reviewing, compiling, and organizing a significant amount of information about Wood Creek District’s operations. In some instances, the requests seek information concerning Wood Creek District’s operations that extends back several years before the test period.

2. Wood Creek District has an office staff of six (6) persons. This staff is responsible for all of Wood Creek District’s administrative functions, as well as the billing and collection functions of East Laurel Water District and West Laurel Water

Association. (When considered collectively, these persons are responsible for the billing and collection for more than 16,000 customer accounts.) Wood Creek's small office staff also serves as customer service representatives for all 16,000 customers, opens new accounts, fields inquiries and complaints, and answers billing questions. This staff has limited resources to prepare and assemble the documents necessary to adequately respond to Commission Staff's extensive requests.

3. Wood Creek District has no experience with discovery requests in general rate adjustment proceedings. While it has applied for three rate adjustments in the last ten years using the Alternative Rate Filing ("ARF") procedures, this proceeding is the first general rate case proceeding in which it has participated. In those prior ARF proceedings, Commission Staff performed its discovery primarily through onsite inspections and records reviews. The current proceeding requires the written responses to complex interrogatories and the production of significant amounts of documentary evidence.

4. Wood Creek District has compiled the necessary information and prepared draft documents to answer approximately 20 percent to 25 percent of the requests, but it will not be able to complete the response by August 1, 2022. Rather than filing its response in piecemeal fashion, Wood Creek District believes it will be easier for Commission Staff to review the information and the response if Wood Creek District waits and files one, complete response.

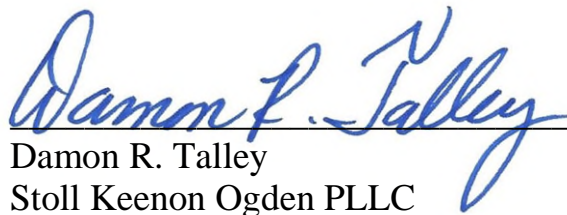
5. Wood Creek District has exercised its best efforts to complete the request to Commission Staff's First Request for Information within the allotted time but needs additional time to complete the response.

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

WHEREFORE, for the foregoing reasons, Wood Creek District respectfully requests an additional 14 days, until August 15, 2022, in which to respond to Commission Staff's First Request for Information.

Dated: July 28, 2022

Respectfully submitted,



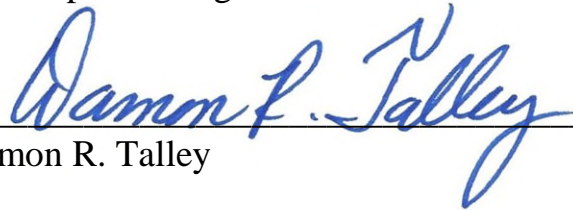
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Counsel for Wood Creek Water District

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 July 28, 2022 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.



Damon R. Talley