COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC ALLEGED FAILURE OF	}
CUMBERLAND WATER DISTRICT AND	}
ITS OFFICERS, ERIC CARVER, GARLAND	} CASE NO.
HIENEMAN, JAY CARY, MARK VIBBERT, TROY	} 2022-00244
NORRIS, AND ITS MANAGER, MATTHEW DYER	}
TO COMPLY WITH COMMISSION ORDER, KRS 278.990	}

MOTION FOR EXTENSION OF TIME TO RESPOND TO REQUEST FOR INFORMATION

Comes now CUMBERLAND WATER DISTRICT, by Counsel, pursuant to Order of November 17, 2022 and moves this body for an additional twenty (20) days to Respond to the Commission's Request for Information. In support of same, the undersigned Counsel would state:

- 1. The Cumberland Water District's Manager is in the process of retiring, and an incoming manager is joining the Cumberland Water District;
- 2. That the undersigned counsel, Hon. Coleman M. Hurt, is newly-elected County Attorney for Cumberland County, and will assume the position full-time in January of 2023, and prior counsel for the Water District is retiring;
- 3. That some of the requested board minutes may be in audio format in addition to the written minutes and may need to be transcribed in order to provide fuller and more complete Responses to the Commission's Requests;
- **4.** That this request for an additional 20 days is made timely, and prior to the pending deadline.

WHEREFORE, the undersigned respectfully requests an additional twenty (20) days to produce the Documentation and Responses requested by the Commission, which if granted would make the date certain for submission Thursday, January 5th, 2023

Respectfully submitted,

BY: <u>/S/ LINDSEY G. BELL</u> HON. LINDSEY G. BELL CUMBERLAND COUNTY ATTORNEY

BY: /S/ COLEMAN M. HURT
HON. COLEMAN M. HURT
HURT LAW OFFICE
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VERIFICATION

I, Matthew Dyer, Manager of the Cumberland Water District, verify that I have read the above statements and that they are true and correct to the best of my knowledge and belief.

MATTHEW DYER

MANAGER, CUMBERLAND WATER DISTRICT

COMMONWEALTH OF KENTUCKY COUNTY OF CUMBERLAND

SUBSCRIBED, SWORN and ACKNOWLEDGED to before me, a Notary Public, by Svenda Bowlin, this 15 day of December, 2022.

NOTARY PUBLIC, STATE AT LARGE

MY COMMISSION EXPIRES: 7-12-2023
IDENTIFICATION NUMBER: (24795

CERTIFICATE OF SERVICE

The foregoing was served by electronic mail a true and correct copy of same to the below this 15th day of December, 2022.

Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

/S/ COLEMAN M. HURT HON. COLEMAN M. HURT