

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC ALLEGED FAILURE OF)
FARMDALE WATER DISTRICT, AND)
ITS INDIVIDUAL COMMISSIONERS)
RICHARD TANNER, DONALD MORSE,)
AND SCOTTIE WOOLRIDGE, AND) CASE NO. 2022-00347
MANAGER JAMIE ROBERTS TO)
COMPLY WITH KRS 278.030, 807 KAR)
5:006, SECTION 4(4), 807 KAR 5:006,)
SECTION 26 AND 807 KRS 5:066)**

**MOTION FOR EXTENSION OF TIME TO
RESPOND TO ORDER OF NOVEMBER 7, 2022**

Scottie Woolridge and Jamie Roberts (“Respondent Officers”) and Farmdale Water District (“the District”) move for an extension of time until January 16, 2023, to respond to the allegations set forth in the Public Service Commission’s Order of November 7, 2022. In support of its motion, Respondent Officers and the District state:

1. On November 7, 2022, the Public Service Commission (“the Commission”) initiated this proceeding to investigate the District’s alleged failure to comply with KRS 278.030, 807 KAR 5:006 and 807 KAR 5:066. It directed the

District and Respondent Officers¹ to submit a written response to the allegations contained in its Order within 20 days of service.

2. The current members of the District's Board of Commissioners did not become aware of the Order of November 7, 2022, until the week of December 5, 2022 and, because of their limited experience as commissioners and their limited knowledge of utility laws and regulations, failed to recognize the seriousness of the District's situation. They did not alert the District's counsel to the Order until December 9, 2022. Upon learning of the Order's existence, counsel promptly entered an appearance in this proceeding.

3. Because counsel only recently became aware of this proceeding, he requires time to review the circumstances that led to the Order of November 7, 2022; to interview the District's officials and examine its records; and to prepare a meaningful and accurate response to the Order.

4. The District and the Respondent Officers request an extension of time until January 16, 2023, to submit their written responses to the Order. In addition to the preparation of written responses to the Order, this additional time will be used to remedy as many of the deficiencies noted in the Order as possible.

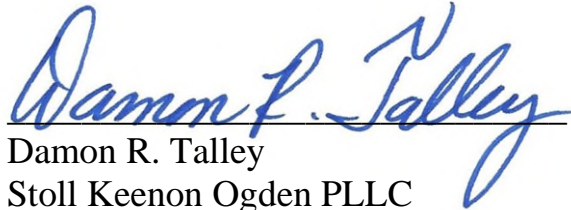
5. This request is made in good faith and not for purposes of delay.

¹ In its Order of November 7, 2022, the Commission also directed Richard Tanner and Donald Morse to submit written responses to the allegations contained in its Order. Mr. Tanner and Mr. Morse are no longer members of the District's Board of Commissioners.

WHEREFORE, Farmdale Water District and the Respondent Officers request that the Public Service Commission extend to January 16, 2023, the time for the District to respond to the Order of November 7, 2022.

Dated: December 14, 2022

Respectfully submitted,



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

Felisa S. Moore
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
Telephone: (859) 231-3039
Fax: (859) 259-1093
felisa.moore@skofirm.com

*Counsel for Farmdale Water District and
Respondent Officers*

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, and the Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was submitted electronically to the Public Service Commission on December 14, 2022, and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.


Counsel for Farmdale Water District and
Respondent Officers