

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF</b>	)	
<b>BLUEGRASS WATER UTILITY</b>	)	
<b>OPERATING COMPANY, LLC FOR AN</b>	)	<b>Case No. 2022-00432</b>
<b>ADJUSTMENT OF SEWAGE RATES</b>	)	

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**BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC’S  
MOTION FOR EXTENSION OF TIME  
TO RESPOND TO CERTAIN OF STAFF’S THIRD SET OF DATA REQUESTS AND  
THE ATTORNEY GENERAL’S SECOND SET OF DATA REQUESTS**

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Bluegrass Water Utility Operating Company, LLC (“Bluegrass Water” or the “Company”), by counsel, and pursuant to 807 KAR 5:001 Section 5, hereby moves for a brief extension of time, until June 22, 2023, to respond to certain of Staff’s Third Requests for Information and certain of the Attorney General’s Second Requests for Information (collectively and individually, the “Requests”). In particular, the Company seeks a six day extension to respond to the following Requests: (i) **PSC 3-21** and **PSC 3-23**; and (ii) **OAG 2-6, OAG 2-19, OAG 2-20, OAG 2-22, and OAG 2-26**. In support of its motion, Bluegrass Water states as follows.

Bluegrass Water received over 110 data requests (not counting subparts) during this latest round of Requests. Despite its best efforts to complete all of the responses by today’s deadline, it has become apparent today that the Company will require a short period of additional time to complete the Requests that are the subject of this motion. The Company is leanly staffed and involved in multiple contemporaneous regulatory proceedings. Consequently, due to a combination of conflicting work commitments and the travel schedules of relevant subject matter experts, the Company has been unable to complete responses to the subject Requests by today.

The Company anticipates that it will be able to provide the few remaining responses no later than Thursday, June 22, 2023.<sup>1</sup>

The Company has worked diligently to provide complete and timely responses to the multitude of supplemental data requests received, as demonstrated by its other filings made contemporaneously herewith. However, at this time it is still working to gather data sufficient to enable a response to the remaining subject Requests.

This motion is made in good faith and not for purposes of delay. Bluegrass Water's request for a short extension will not delay this matter, should not result in a shift of any future dates on the procedural schedule, nor will it prejudice any party or intervenor.

**WHEREFORE**, Bluegrass Water respectfully asks the Commission grant a brief extension until June 22, 2023, to respond to (i) **PSC 3-21** and **PSC 3-23**; and (ii) **OAG 2-6**, **OAG 2-19**, **OAG 2-20**, **OAG 2-22**, and **OAG 2-26**.

Respectfully submitted,

/s/ Edward T. Depp

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<sup>1</sup> If circumstances permit, the Company will file sooner.

### **Certification**

I hereby certify that a copy of this filing has been served electronically on all parties of record through the use of the Commission's electronic filing system, and there are currently no parties that the Commission has excused from participation by electronic means. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, a paper copy of this filing has not been transmitted to the Commission.

/s/ Edward T. Depp  
*Counsel to Bluegrass Water Utility  
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