

**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 SCOTT COUNTY’S  
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 an extension of time to May 19, 2023 to respond to Intervenor Scott County’s first set of requests for information (“Requests”). In support of its motion, Bluegrass Water states as follows.

On April 28, Bluegrass Water received twenty-seven data requests from Commission Staff and an additional 135 data requests from the Attorney General’s Office of Rate Intervention (“OAG”). Counting subparts, the total number of data requests from the OAG, alone, exceeds 350.<sup>1</sup> Those responses are due by May 12. Bluegrass Water is presently working on those responses, and it began working on those data requests upon receipt.

Despite the fact that it had not been granted intervenor status as of April 28, Scott County also filed an additional set of data requests on that date. One week later (on the afternoon of Friday, May 5) Scott County was made a formal intervenor in this case. On the morning of Monday, May 8, Bluegrass Water reached out to Scott County to confirm and seek agreement that Bluegrass

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<sup>1</sup> Although Bluegrass Water acknowledges that the Commission is not bound by the Rules of Civil Procedure, *compare* CR 33.01(3).

Water would have two weeks (to Friday, May 19) to respond to Scott County's Requests. The parties were not able to reach agreement.

Allowing Bluegrass Water to respond to Scott County's Requests by May 19 will not prejudice Scott County, as Scott County will have ample time to review the responses before supplemental data requests are due to be served a week later, on May 26. It will also afford Bluegrass Water the same amount of time to respond to Scott County's data requests as it was afforded to respond to the Commission Staff and OAG requests.

This motion is made in good faith and not for purposes of delay. This case is in its early stages and granting Bluegrass Water's request for a short extension will not delay this matter, will 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 May 19, 2023 to respond to Scott County's Requests.

Respectfully submitted,

/s/Edward T. Depp

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**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*  
*Operating Company, LLC*