

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

In the Matter of:

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

**BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC’S
MOTION FOR EXTENSION OF TIME
TO RESPOND TO ATTORNEY GENERAL’S
FIRST SET OF DATA REQUESTS**

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 certain of the Attorney General’s First Requests for Information (“Requests”). In particular, the Company seeks a one (1) week extension to respond to OAG 1-47, 1-48, 1, 51, 1-53, 1-54, 1-55, 1-103, 1-115, and 1-121. Counsel to Bluegrass Water has conferred with counsel to the Attorney General, who has authorized the undersigned to represent that the Attorney General has no objection to the requested extension of time. In support of its motion, Bluegrass Water states as follows.

On April 28, Bluegrass Water received twenty-seven data requests from Commission Staff (“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. Bluegrass Water began working on those data requests upon receipt. Pursuant to the procedural schedule issued in this matter, responses to these data requests are due on May 12. While the Company was able to timely complete responses to the Staff requests, as well as the

majority of the OAG's Requests, it has not yet been able to complete responses to nine of the OAG's Requests: OAG 1-47, 1-48, 1-51, 1-53, 1-54, 1-55, 1-103, 1-115, and 1-121.

Bluegrass Water has worked diligently to provide complete and timely responses and has endeavored to gather all the necessary information, as demonstrated by its other filings made contemporaneously herewith. However, at this time it is still gathering data sufficient to enable a response to the subject 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 OAG Requests No. 1-47, 1-48, 1-51, 1-53, 1-54, 1-55, 1-103, 1-115, and 1-121.

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
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Operating Company, LLC*