

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

In the Matter of:

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 CERTAIN OF STAFF’S FOURTH 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 a brief extension of time, until Wednesday, August 2, 2023, to respond to one subpart of Commission Staff’s Fourth Requests for Information. In particular, the Company seeks a six day extension to respond to **PSC 4-14(c)**.

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 response to the one subpart of PSC 4-14 that is the subject of this motion. The Company is leanly staffed and involved in multiple contemporaneous regulatory proceedings.¹

The Company has worked diligently to provide complete and timely responses to the 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 PSC 4-14(c).

¹ If circumstances permit, the Company will file sooner.

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 Wednesday, August 2, 2023, to respond to **PSC 4-14(c)**.

Respectfully submitted,

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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*