

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC INVESTIGATION INTO THE)	
FINANCIAL AND OPERATING CAPACITY OF)	CASE NO.
BLACK MOUNTAIN UTILITY DISTRICT)	2023-00235

MOTION FOR EXTENSION OF TIME

Comes now Black Mountain Utility District, its commissioners, Bill Clem, Brandon Shepherd, Chad Brock, Dwayne Williams, and Shawn Miller and its manager, Grant Cooper, (collectively, “Black Mountain”) by and through counsel, and respectfully requests the Kentucky Public Service Commission (“Commission”) grant an extension of time until November 17, 2023 for Black Mountain to respond to the Commission’s October 9, 2023 Order. In support of this motion, Black Mountain states as follows:

1. Black Mountain received the Commission’s Order on October 9, 2023. After reviewing the Order, Black Mountain discussed with Harlan County Judge Executive, Dan Mosley. Mr. Mosely reached out to L. Allyson Honaker of Honaker Law Office, PLLC by email on the afternoon of Friday, October 13, 2023. Mr. Mosely and Mrs. Honaker scheduled a telephone conference to discuss possible representation on Monday, October 16, 2023.

2. Black Mountain held a special board meeting on the evening of Tuesday, October 17, 2023 to discuss the Commission’s Order and the possible representation by Mrs. Honaker. The board approved hiring Mrs. Honaker. Grant Cooper notified Mrs. Honaker of the Board’s decision on October 18, 2023.

3. Due to scheduling issues, Black Mountain has scheduled a meeting with Mrs. Honaker to discuss the Commission's October 9, 2023 Order and the response to same for October 24, 2023.

4. The Commission's Order contains many allegations to which Black Mountain must respond. This will take a considerable amount of time to gather the necessary information needed to respond.

5. In order to provide a thorough response to the Commission's Order, Black Mountain is requesting an extension of time up to and including November 17, 2023 to file a response to the Commission's October 9, 2023 Order.

6. The extension will allow counsel to meet with and discuss the Commission's Order and the necessary items needed to prepare Black Mountain's response. It will also allow the necessary time for counsel to draft a response and for Black Mountain to review and approve the response before filing.

7. There are no other parties to this proceeding. Therefore, the nineteen day extension will not harm any other party, and will allow Black Mountain to provide a thorough response to the Commission's Order.

WHEREFORE, on the basis of the foregoing, Black Mountain respectfully requests that the Commission grant an extension until November 17, 2023 for Black Mountain to respond to the Commission's October 9, 2023 Order.

Dated this 19th day of October, 2023.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that foregoing was submitted electronically to the Commission on October 19, 2023 and that there are no parties that have been excused from electronic filing. Pursuant to prior Commission orders, no paper copies of this filing will be submitted.



Counsel for Black Mountain Utility District.