

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

In the Matter of:)
)
 Electronic Application of Bluegrass)
 Water Utility Operating Company, LLC) **Case No. 2025-00354**
 For an Adjustment of Water and)
 Sewage Rates)
)

**BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC’S
MOTION FOR EXTENSION OF TIME**

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 Friday, March 6, 2026, to respond to certain of Staff’s Second Requests for Information and certain of Scott County’s and the Attorney General’s First Requests for Information (collectively and individually, the “Requests”). The particular Requests for which the Company seeks this brief extension are identified in more detail below. In support of its motion, Bluegrass Water states as follows.

Bluegrass Water received over 263 data requests (not counting subparts) during this latest round of data requests. Despite its best efforts to complete all of the responses by today’s deadline, it has become apparent that the Company will require a brief extension of time to complete certain Requests. The Company has worked diligently to provide complete and timely responses to the multitude of data requests received, as demonstrated by its other filings made contemporaneously herewith. At this time, however, it is still working to gather data sufficient to enable a response to the remaining Requests.

This motion is made in good faith and not for purposes of delay. The Company is currently involved in six contemporaneous regulatory proceedings around the country. Work in each of those

matters has been significant, and the Company's staff responsible for addressing regulatory matters has been working hard to address them simultaneously. Unfortunately, activities in these various matters recently presented significant overlapping tasks that have made it extremely difficult for the Company to complete the high volume of data requests in the typical two week timeframe. Consequently, the Company seeks a brief four day extension to complete the data requests.

Bluegrass Water's request for this brief extension will not delay this matter, should not result in a shift of any future dates on the procedural schedule, and should not prejudice any intervenor.

WHEREFORE, Bluegrass Water respectfully asks the Commission grant a brief extension until March 6, 2026, to respond to the following data requests.

- PSC 2nd Data Requests: 20(b), 37, 38, 44, 45, 46, 47, 48, 49, 50, 51, 52, and 58;
- SC 1st Data Requests: 1, 22, and 23;
- OAG 1st Data Requests: 2, 4, 5, 6, 9, 12, 13, 15, 16, 17, 18, 20, 21, 22, 23, 25, 26, 30, 34, 39, 42, 45, 47, 51, 52, 53, 54, 56, 60, 61, 63, 64, 66, 67, 75, 76, 77, 82, 83, 84, 85, 88, 94, 95, 96, 111, 112, 113, 114, 115, 116, 117, 118, 120, 121, 122, 123, 126, 127, 128, 131, 133, 134, 135, 136, 137, 138, 139, 140, 141, 143, 144, 145, 146, 147, 148, 151, 153, 154, 155, 157, 158, 159, 160, 167, 168, 170, 171, 173, 174, 175, 176, 177, 179, 180, and 181.

This the 2nd day of March, 2026.

Respectfully submitted,

/s/ Edward T. Depp

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Motion for Extension (PSC Second DRs and OAG First DRs)

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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*