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JUN 06 2018

PUBLIC SERVICE COMMISSION



BRIAN CUMBO

86 W. Main St., Suite 100 P.O. Box 1844 Inez, KY 41224 (606) 298-0428 FAX: (606) 298-0316 cumbolaw@cumbolaw.com

ADMITTED IN KY AND WV

June 1, 2018

Public Service Commission P.O. Box 615 Frankfort, KY 40602

RE: Martin County Water District PSC Case No. 2018-00017

To Whom It May Concern:

Enclosed please find and original and six (6) copies of Motion for Extension of Time regarding the above matter.

Thank you for your attention to this matter.

Very truly yours,

In Can h

**BRIAN CUMBO** 

BC/ld Enclosure

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#### COMMONWEALTH OF KENTUCKY

JUN 06 2018

PUBLIC SERVICE COMMISSION

### BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF THE MARTIN COUNTY WATER DISTRICT FOR ALTERNATIVE RATE ADJUSTMENT

CASE NO. 2018-00017

## **MOTION FOR EXTENSION OF TIME**

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Comes the applicant, Martin County Water District (hereinafter District), by counsel, and moves the Public Service Commission for an extension of time in which to file its' written comments and objections to the findings contained in the Commission's Staff Report filed of record on May 22, 2018.

As grounds therefore, the individual who prepared the rate application on behalf of the District, Alan Vilines, of Kentucky Rural Water Association, is currently out of the country, and will not return to the States until June 9, 2018.

That Mr. Vilines input, advice and expertise is necessary so that the District can make an informed response. That the District requests an extension until June 30, 2018.

That the Affidavit of Greg Heitzman is attached hereto attesting to his communication with Alan Vilines.

That the District is aware that the Commission is, by Statute and Regulation, directed to take certain procedural steps within a designated timeframe. That the District does hereby waive those time requirements.

Further, the Martin County Concerned Citizens indicated at the hearing before the Commission on May 31, 2018, that they would also be seeking an extension of time, and the District has no objection to the Martin County Concerned Citizens having an extension of time. In fact, the District would ask that any extension of time granted to the District should likewise be granted to the Martin County Concerned Citizens.

Wherefore, counsel requests the appropriate Orders of the Commission consistent with this

Motion.

BRÍAN CUMBO COUNSEL FOR MARTIN COUNTY WATER DISTRICT P.O. BOX 1844 INEZ, KY 41224 TELEPHONE: (606) 298-0428 TELECOPIER: (606) 298-0316 EMAIL: cumbolaw@cumbolaw.com

#### CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was emailed and mailed, postage prepaid, on this the \_\_\_\_\_ day of June, 2018, to the following:

Public Service Commission P.O. Box 615 Frankfort, KY 40602 *brittany.koenig@ky.gov* 

Hon. Mary Varson Cromer Appalachian Citizens' Law Center, Inc. 317 Main Street Whitesburg, KY 41858 mary@appalachianlawcenter.org Hon. M. Todd Osterioh Hon. James Wilson Gardner Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street, Ste. 1400 Lexington, KY 40507 tosterloh@sturgillturner.com jameswilsongardner@gmail.com

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BRIAN CUMBO

## COMMONWEALTH OF KENTUCKY

# BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

# THE APPLICATION OF THE MARTIN COUNTY WATER DISTRICT FOR ALTERNATIVE RATE ADJUSTMENT

CASE NO. 2018-00017

# **AFFIDAVIT OF GREG HEITZMAN**

Comes the Affiant, Greg Heitzman, after being duly sworn, and states as follows:1. That I, Greg Heitzman, PE, MBA, operate Blue Water, Kentucky, and am a consultant for the Martin County Water District.

2. That I hereby attest to my communication with Alan Vilines, who indicated that he is presently out of the United States, and will not return until June 9, 2018.

Further the Affiant saith naught.

**GREG H** ZMAN

STATE OF KENTUCKY) COUNTY OF Martin

the

SUBSCRIBED, ACKNOWLEDGED and SWORN TO before me by Greg Heitzman this

day of 2017. 18-18 My Commission Expires:

NOTARY PUBLIC, STA