

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CITY OF DRAKESBORO D/B/A)
DRAKESBORO NATURAL GAS)
COMPANY)
_____)
)
ALLEGED FAILURE TO COMPLY WITH)
KRS 278.495, 807 KAR 5:027, AND)
49 C.F.R. PART 192)

MOTION TO CONTINUE

Comes now, the City of Drakesboro, by counsel, and hereby moves this commission to re-schedule the hearing currently set for March 8, 2019. In support thereof, counsel states as follows:

The City of Drakesboro has recently retained counsel in this matter and counsel does not believe that he can sufficiently present to the Commission the information and arguments necessary properly address the issues raised in this action. The gathering and evaluation of the relevant evidence for presentation at a hearing regarding thirty-five violations cannot be performed within a week.

Given that City of Drakesboro has provided proof, by both email from the mayor and by notice of filing via electronic means, of its contract with a third party provider there is no prejudice that will occur to the public or to the Commission by allowing counsel and the City of Drakesboro additional time to organize its evidence and presentation to the Commission.

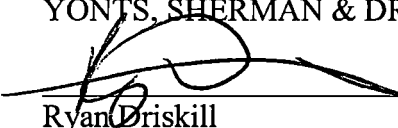
Finally, the City of Drakesboro has taken and will continue to take all measures recommended by the Commission in order to remedy any deficiencies of its natural gas system.

The City is prepared to spend hundreds of thousands of dollars and expend great effort to provide safe and inexpensive utilities to its populace.

In sum, there can be no reasonable expectation that the City can appropriately prepare for an evidentiary hearing in a matter of only a few days. The City of Drakesboro is working tirelessly to act on the recommendations and counsel of the Commission and its members. Thus, for the sake of fairness, the undersigned requests that the hearing set for March 8, 2019 be re-scheduled to a later time. The consideration of Commissioner in this motion is greatly appreciated.

Respectfully submitted,

YONTS, SHERMAN & DRISKILL, P.S.C.




Ryan Driskill
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Greenville, KY 42345

CERTIFICATE OF SERVICE

This is to certify that the above motion was mailed via first class prepaid, overnight, USPS mail to the Commission on this the 2nd day of March, 2019 at the following address:

211 Sower Boulevard
Frankfort, Kentucky 40601



Ryan Bennett Driskill