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COMMONWEALTH OF KENTUCKY

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE)	
WATER SERVICE RATES OF CENTRAL CITY)	Case No. 2019-00260
MUNICIPAL WATER & SEWER)	

MOTION FOR AN EXTENSION OF TIME

The City of Central City, by counsel, respectfully moves the Public Service Commission for an Order extending the deadline by which Central City must file its responses to the requests for information contained in Appendix A of the Commission's Order dated July 30, 2019. Specifically, Central City requests that it be allowed an additional two weeks (i.e., until Wednesday, August 28, 2019) to file its responses.

In support of this Motion, Central City states that additional time is necessary in order to adequately review, compile, and confirm the extensive information and voluminous documentation Central City must provide pursuant to the Commission's July 30, 2019 Order. While Central City endeavors to provide its responses to the Commission's requests for information as soon as practicable, it does not anticipate that it can produce the requested information in the time frame allotted by the Commission's Order. An additional two weeks is requested because Central City's engineer Mike McGhee will be integral to providing responses to the Commission's request, and he will be on vacation for six days of that period.

Central City understands the Commission's position on extensions of time and submits that good cause exists to ensure the City can provide the testimony, information, and records that the Commission has requested. The relatively brief extension of time sought herein is reasonable and will still allow for sufficient time by which the Commission must render a decision in this matter, which is set for no later than April 23, 2020.

In granting this motion, it would be appropriate for the Commission to alter the remaining deadlines of the procedural schedule set forth in Appendix B of the Commission's Order dated July 30, 2019. Central City proposes a two-week extension for each of those deadlines. The undersigned counsel has communicated with counsel for both Muhlenberg County Water District and Muhlenberg County Water District No. 3, who indicated that the water districts would not object to the requested extension.

Accordingly, Central City requests an Order extending the deadline by which Central City must file its responses to the requests for information on or before Wednesday, August 28, 2019

Respectfully submitted,

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ATTORNEYS FOR CITY OF CENTRAL CITY

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, I certify that this document has been served on counsel for Muhlenberg County Water District and Muhlenberg County Water District No. 3 electronically and via U.S. Postal Service on August 9, 2019.

Honorable Damon R Talley Attorney at Law Stoll Keenon Ogden PLLC P.O. Box 150 Hodgenville, KENTUCKY 42748

Counsel for Central City

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