

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

**RECEIVED**

**JUN 23 2017**

Public Service  
Commission

IN THE MATTER OF:

**THE APPLICATION OF THE MOUNTAIN WATER )  
DISTRICT FOR THE ISSUANCE OF A )  
CERTIFICATE OF PUBLIC CONVENIENCE AND )  
NECESSITY TO CONSTRUCT AND FINANCE A )  
SEWER SYSTEM IMPROVEMENTS PROJECT )  
PURSUANT TO THE PROVISIONS OF )  
KRS 278.020, KRS 278.300, 807 KAR 5:001 )  
AND 807 KAR 5:071 )**

**Case No. 2017 -00150**

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**MOTION FOR REHEARING**

The Applicant, Mountain Water District (the "District"), by Counsel, files this Motion for Rehearing relating to the Commission Order dated June 12, 2017.

1. The Commission issued its Order dated June 12, 2017 in the above referenced Case, which Order included 9 ordering paragraphs.

2. Ordering paragraph #4 requires the District to have the approved construction inspected by a licensed professional engineer to ensure that the construction work is done in accordance with the contract drawings and specifications. The construction approved in this Case involves the acquisition of residential grinder pump units for installation within the force main system. Due to the fact that the construction is "acquisition only", there were no contract drawings and specifications prepared and accordingly, there is no actual construction to be inspected. The District will use its own employees to install the units.

3. Ordering paragraph #7 requires the District to file with the Commission documentation of the total costs of the Project, including the cost of construction and all other capitalized costs within 60 days of the substantial completion date. The District plans on installing the new units to replace existing units that fail, therefore, depending on the failure rate of such existing units, it may take from seven months to one year before all of the new units are installed. The District would like to file with the Commission documentation in the following manner: when (a) fifty percent of the units are installed; and (b) ninety percent of the units are installed (substantial completion).

4. Ordering paragraph #8 requires the District to file a copy of the "as-built" drawings and a certified statement that the construction has been satisfactorily completed. As there are no drawings in the Case, the District would like to file certified statements in accordance with the schedule outlined in paragraph 3 hereof.

WHEREFORE, the District, by Counsel, hereby moves the Commission as follows:

- (A) Remove the requirement in Ordering paragraph #4 that the District be required to have the construction inspected by a licensed professional engineer; and
- (B) Revise the language in Ordering paragraphs #7 and 8 to allow the District to file with the Commission documentation in the manner outlined in paragraph #3 above.

Respectfully Submitted,

Rubin & Hays

By



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