

MAY 25 2018

PUBLIC SERVICE
COMMISSION

In the Matter of:

Petition of Northern Kentucky)	
Water District for a Deviation from)	Case No. 2018-00165
807 KAR 5:006 § 17 and 19)	

PETITION FOR DEVIATION

Northern Kentucky Water District, (NKWD) by counsel, pursuant to 807 KAR 5:006§ 26, petitions for a deviation from 807 KAR 5:006 § 17 and 19. By letter dated May 31, 2017, the Commission notified all water districts of a change of procedures related to third party testing facilities and meter testing, giving until January 1, 2018 to comply. In a subsequent letter dated December 27, 2017, the deadline for compliance with the new procedures was extended to July 1, 2018. NKWD petitions for an extension of time to comply with the revised procedures

1. NKWD's office address is 2835 Crescent Springs Rd., Erlanger, KY 41018-0640. Its principal officers are listed in its current Annual Report.

Its contact email address is:

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2. NKWD is a non-profit water district organized under Chapter 74 and has no articles of incorporation; its web page is www.nkywater.org.

3. NKWD has been actively engaged in efforts to comply with the new procedures. On April 17, 2018, NKWD filed a request for a staff opinion to clarify several issues related to the new procedures. No response has been received.

4. NKWD staff has researched certifying its own personnel during the extension period but it is unclear what certification will be acceptable and it appears that it is not possible to complete certification by the July 1 deadline. NKWD has also researched third party vendors to certify the meter test bench during the extension period, but is uncertain if these vendors meet PSC standards without clarifying information from the PSC.

5. To date, NKWD has been unable to contract with any third party testing facility that would meet the Commission's standards (especially since it is unclear which facility would be acceptable to the Commission and meet applicable standards).

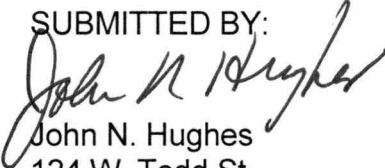
6. Based on NKWD's investigation into the compliance requirements, even after a third party vendor is located, it will take a number of months to establish the testing procedures and practices necessary to comply with the regulation.

7. Given the circumstances involved in attempting to obtain a third party vendor for testing compliance, NKWD will not be able to meet the July 1, 2018 deadline established by the Commission.

8. NKWD seeks a deviation from the July 1, 2018 deadline established in the letter to July 1, 2019.

For these reasons, NKWD petitions for an extension until July 1, 2019 to comply with the regulations.

SUBMITTED BY:



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