



**GERALD WUETCHER**  
DIRECT DIAL: (859) 231-3017  
DIRECT FAX: (859) 258-3517  
gerald.wuetcher@skofirm.com

2000 PNC PLAZA  
500 WEST JEFFERSON STREET  
LOUISVILLE, KY 40202-2828  
MAIN: (502) 333-6000  
FAX: (502) 333-6099

**RECEIVED**

**APR 13 2018**

**PUBLIC SERVICE  
COMMISSION**

April 13, 2018

Ms. Gwen R. Pinson, Esq.  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602-0615

**Re: *Application of Estill County Water District No. 1 to Issue Securities in the Approximate Principal Amount of \$2,745,000 For the Purpose of Refunding And/Or Reamortizing Certain Outstanding Obligation of the District Case No. 2018-00058***

Dear Ms. Pinson:

Enclosed for filing are an original and 10 copies of Estill County Water District No. 1's *Motion to Postpone Hearing*. If Commission Staff has any questions regarding this motion, please contact me.

Very truly yours,

Stoll Keenon Ogden PLLC

A handwritten signature in blue ink that reads "Gerald Wuetcher".

Gerald Wuetcher

GEW  
Enclosures

RECEIVED

APR 13 2018

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF ESTILL COUNTY WATER )  
DISTRICT NO. 1 TO ISSUE SECURITIES IN )  
THE APPROXIMATE PRINCIPAL AMOUNT )  
OF \$2,745,000 FOR THE PURPOSE OF ) CASE NO. 2018-00058  
REFUNDING AND/OR REAMORTIZING )  
CERTAIN OUTSTANDING OBLIGATION OF )  
THE DISTRICT )

MOTION TO POSTPONE HEARING

Estill County Water District No. 1 (“Estill District”), by counsel, moves to postpone generally the scheduled hearing in this matter. In support of its motion, Estill District states:

1. Subsequent to the Public Service Commission’s Order of April 10, 2018 scheduling a hearing in this matter, Kentucky Rural Water Finance Corporation’s (“KRWFC”) financial advisor recalculated the proposed loan to reflect current market conditions. Given the changes in financial market conditions since the submission of Estill District’s application for authorization to enter a loan agreement with KRWFC, Estill District’s Board of Commissioners and KRWFC’s Board of Directors must review these results to determine whether the proposed loan transaction should continue in its present form or whether modifications to the proposed transaction are required.

2. If modifications to the proposed transaction are required, Estill District will be required to either amend its present application or to submit a new application. Such action requires the approval of Estill District’s Board of Commissioners.

3. These reviews of the existing loan cannot be completed before the scheduled hearing.

a. KRWFC's permanent staff will confer with select members of KRWFC Board of Directors within the next seven days to review the calculations of KRWFC's financial advisors and determine whether KRWFC's present commitment to extend financing to Estill District should be continued, revised or terminated. Their decision is not expected prior to the scheduled hearing. KRWFC Staff has advised that a decision prior to the scheduled hearing in this matter is not likely.

b. Estill District's Board of Commissioners is in transition, making it difficult to arrange a meeting. Two Commissioners have tendered their resignations in accordance with their Offer of Settlement in Case No. 2017-00467. These resignations are scheduled to become effective shortly. Estill District's remaining commissioner was recently appointed and has yet to attend his first Board of Commissioners' meeting. Furthermore, Estill District's action is dependent upon KRWFC's decision regarding the loan commitment.

4. In its Order of April 10, 2018, the Public Service Commission directed that Estill District "present evidence on how it intends to address its existing operational problems in general and its excessive percentage of water loss in particular." The Kentucky Rural Water Association began an extensive field examination of Estill District's water system on April 11, 2018. This examination is scheduled to be completed by April 13, 2018. (The review was scheduled several weeks ago.) The results of this examination will be presented to Estill District's Board of Commissioners. A postponement of the scheduled hearing would enable Estill District to incorporate the findings of this examination into its testimony and provide the Public Service Commission with a more extensive and current view of Estill District's operational problems and the actions necessary to correct those problems.

5. Estill District has requested that Anthony Hollinsworth, Rural Development's State Director for Community Programs, appear and provide testimony at the hearing scheduled

for April 16, 2018. It is attempting to serve a subpoena upon Mr. Hollinsworth to compel his attendance. 7 CFR §1.214 requires Mr. Hollinsworth to obtain the approval of senior officials with Rural Development and the Department of Agriculture to appear before and provide testimony to the Public Service Commission. It is unlikely that the approval of these officials can be obtained in time to permit Mr. Hollinsworth's appearance at the scheduled hearing.

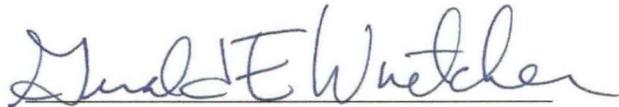
6. Estill District requests that the hearing be postponed and that it be allowed to report to the Public Service Commission no later than April 27, 2018 regarding the status of its application and the proposed loan.

7. This motion is not made for purposes of delay.

WHEREFORE, Estill District requests that the Public Service Commission postpone generally the schedule hearing in this matter and that it allow Estill District to submit no later than April 27, 2018 a written report on the status of its application and the proposed loan no later

Dated: April 13, 2018

Respectfully submitted,



Gerald E. Wuetcher  
gerald.wuetcher@skofirm.com  
Stoll Keenon Ogden PLLC  
300 West Vine Street, Suite 2100  
Lexington, Kentucky 40507-1801  
Telephone: (859) 231-3017  
Fax: (859) 259-3517

W. Randall Jones  
wrjones@rubinhays.com  
Rubin and Hays  
Kentucky Home Trust Building  
450 South Third Street  
Louisville, Kentucky 40202  
Phone: (502) 569-7525  
Fax: (502) 569-7555

*Counsel for Estill County Water District No. 1*