

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
MOUNTAIN WATER DISTRICT PURSUANT)	
TO 807 KAR 5:071, SECTION 7(4) FOR)	CASE NO. 2018-00147
APPROVAL OF PROPOSED INSPECTION)	
PROCEDURE)	

MOTION FOR EXTENSION OF TIME

Mountain Water District (“Mountain District”) moves for an extension of time until November 26, 2018 to submit its responses to Commission Staff’s First Request for Information.

In support of its motion, Mountain District states:

1. On October 19, 2018, Commission Staff issued its First Request for Information in this proceeding. Among the requested items, Commission Staff requested: (1) the number of service calls that Mountain District has received regarding grinder/pump stations since 2010; (2) the portion of these calls that were “emergency calls;” (3) whether Mountain District responded to each “emergency call” within 40 minutes; and (4) the number of complaints that Mountain District received regarding its grinder/pump stations since 2010. Commission Staff requested that Mountain District provide the requested information within 14 days.

2. Mountain District’s computer software allows Mountain District only to identify work orders related to its grinder/pump stations. It does not allow for a more detail analysis of these work orders. To accurately and properly respond to Commission Staff’s Request, Mountain District must individually review each of the approximately 6,500 work orders related to its grinder/pump stations, and then organized and record the relevant information in each order in a separate database. Mountain District lacks sufficient personnel to complete this task within

the required 14-day period without reassigning personnel from mission-critical areas and adversely affecting the quality of service.

3. Mountain District requests an additional 19 business days or until November 26, 2018 to submit its response to Commission Staff's Request. To the extent possible, it will endeavor to file its response prior to this time.

4. This request is not made for purposes of delay.

5. The requested extension will not prejudice any customer or any interested party.

6. As there is no statutory time in which the Commission must complete its review of Mountain District's application, the requested delay will not adversely affect or limit the Public Service Commission's ability to perform its statutory mission.

WHEREFORE, Mountain District moves for an extension of time until November 26, 2018 to submit its response to Commission Staff's First Request for Information.

A proposed order is attached to this Motion. An electronic version of this motion in Microsoft Office format is embedded in the electronic version.

Dated: October 22, 2018

Respectfully submitted,



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Counsel for Mountain Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Mountain District's October 22, 2018 electronic filing of this Motion is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Commission on October 22, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the Motion in paper medium will be delivered to the Commission on or before October 24, 2018.

A handwritten signature in blue ink, reading "Gerald E. Wuetcher", written over a horizontal line.

Gerald E. Wuetcher

PROPOSED ORDER

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MOUNTAIN)
WATER DISTRICT PURSUANT TO 807 KAR)
5:071, SECTION 7(4) FOR APPROVAL OF) CASE NO. 2018-00147
PROPOSED INSPECTION PROCEDURE)
)

ORDER

Mountain Water District has moved for an extension of time until November 26, 2018 to submit its responses to Commission Staff's First Request for Information. Finding good cause exists to grant the motion, the Commission HEREBY ORDERS that:

1. Mountain Water District's Motion for Extension of Time is granted.
2. Mountain District shall file its responses to Commission Staff's First Request for Information no later than November 26, 2018.

By the Commission

ATTEST:

Executive Director