

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ESTILL)	
COUNTY WATER DISTRICT NO. 1 FOR)	
AUTHORIZATION TO CONSOLIDATE ITS)	CASE NO. 2018-00276
EXISTING LOANS WITH CITIZENS)	
GUARANTY BANK)	

**MOTION FOR EXTENSION OF TIME TO SUBMIT
COMPREHENSIVE PLAN TO CORRECT WATER LOSS**

Estill County Water District No. 1 (“Estill District”) moves for an additional 45 days to submit a comprehensive plan to correct its water loss problem. In support of its motion, Estill District states:

1. In its Order of December 21, 2018, the Public Service Commission directed Estill District to prepare and submit “a detailed and comprehensive plan to correct its excessive water loss on or before April 1, 2019, to permit the Commission to monitor its progress in resolving that issue.”¹

2. Estill District’s efforts to prepare such a report were adversely affected by the sudden and unexpected resignation of Dwight Richardson, Estill District’s Operations Manager, in February 2019. Mr. Richardson had been employed by Estill District for over 12 years and had been the primary person responsible for maintaining Estill District’s distribution system and overseeing its water loss efforts. He was the Estill District employee with the greatest knowledge of the distribution system’s operation characteristics and its water loss efforts.

3. In the immediate aftermath of Mr. Richardson’s resignation, Estill District had to temporarily cease its efforts to develop the required plan and focus its attention on maintaining

¹ Order of December 21, 2018 at

the operation of its distribution system in his absence. After resuming its efforts, Estill District was hampered by a lack of written records regarding Estill District's previous water loss control efforts that were known only to Mr. Richardson.

4. As a result of Mr. Richardson's departure, Estill District will require additional time to prepare the comprehensive plan to address its water loss problems. It has entered discussions with Bell Engineering to assist it in the preparation of the plan and expects to enter a contract with that firm within the next seven days.

5. Estill District estimates that an additional 45 days will provide adequate time for preparation of the required report.

6. This motion is made in good faith and not for purposes of delay.

WHEREFORE, Estill County Water District No. 1 requests that the Commission extend by 45 days the time in which it must submit a comprehensive plan to correct its water loss problem.

Dated: March 22, 2019

Respectfully submitted,



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

Counsel for Estill County Water District No. 1

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Estill County Water District No. 1's 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 Public Service Commission on March 22, 2019; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that on or before March 26, 2019 this Application in paper medium will be delivered to the Public Service Commission.

A handwritten signature in blue ink that reads "Gerald E. Wuetcher". The signature is written in a cursive style with a horizontal line underneath the name.

Gerald E. Wuetcher