

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO EXCESSIVE)	CASE NO.
WATER LOSS BY KENTUCKY’S JURISDICTIONAL)	2019-00041
WATER UTILITIES)	

MOTION FOR EXTENSION OF TIME

Comes now, Morgan County Water District (MCWD), by and through Counsel, and respectfully requests an extension of time to comply with the Public Service Commission’s (PSC) final order dated November 22, 2019. Specifically, MCWD is requesting a 60 day extension. As grounds therefore, Morgan County Water District states as follows:

1. That the PSC Order dated November 22, 2019 required MCWD to “file an application for alternative rate adjustment” within six months. Said deadline was extended to September 22, 2020 by PSC Order dated April 7, 2020 due to the ongoing state of emergency.

2. That prior to the entry of the final order dated November 22, 2019, MCWD had begun the process of planning and obtaining funding for a water loss project. To obtain a portion of the funding for said project, MCWD planned on and is now in the process of applying for a USDA Rural Development loan. Upon the advice and direction of the Kentucky Rural Water Association (KRWA), MCWD planned to include the required rate increase in the USDA loan to simplify the processing of the rate increase.

3. That MCWD did not anticipate that it would take this long to finalize the USDA loan and believes that the loan process has been prolonged by the ongoing COVID-19 pandemic. MCWD is currently roughly projecting that the loan process will be finalized in October 2020

but they are unable to provide a firm date as much of the timeline depends on agencies and individuals outside of MCWD; including USDA, Gateway ADD, and bond counsel.

4. That a project schedule from MCWD's engineer, Paul Nesbit, including the projected finish dates of various tasks, has been attached and incorporated into this motion.

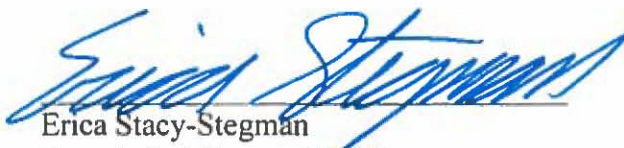
5. That MCWD has complied with all other aspects of the PSC's Order dated November 22, 2019 that are due to be completed. Specifically, MCWD has revised their leak adjustment policy and adopted / revised various other policies and procedures to improve the operations and financial health of the utility, including the development of policies and procedures to address water loss, employee procedures, better business practices, leak detection, and water loss prevention.

WHEREFORE, Morgan County Water District respectfully requests an extension of time to comply with the PSC Order dated November 22, 2019 as it relates to the filing of an application for alternative rate adjustment. Specifically, MCWD is requesting an additional 60 days to comply with said Order.

Respectfully submitted,



Earl Rogers III
Campbell & Rogers, PLLC
Attorneys at Law
154 Flemingsburg Road
Morehead, KY 40351
Telephone: (606) 783-1012
Fax: (606) 784-8926
earl@campbellrogers.com

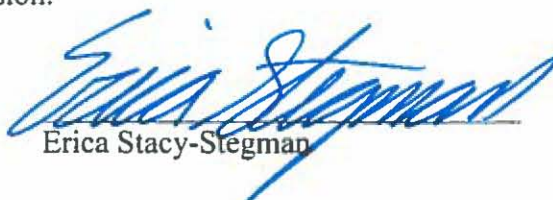


Erica Stacy-Stegman
Campbell & Rogers, PLLC
Attorneys at Law
154 Flemingsburg Road
Morehead, KY 40351
Telephone: (606) 783-1012
Fax (606) 784-8926
erica@campbellrogers.com

Counsel for Morgan County Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Morgan County Water District's electronic filing of this Response 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 Sept. 18, 2020; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and within 30 days following the end of the state of emergency announced in Executive Order 2020-215 this Response in paper medium will be delivered to the Public Service Commission.



Erica Stacy-Stegman

**Morgan County Water District
Water Replacement Project
Project Schedule as of September 15, 2020**

Task	Dates	
	Start	Finish
Submittal of all Checklist Items to RD	9/15/2020	10/15/2020
Request Permission to bid		10/15/2020
Bidding	10/25/2020	11/15/2020
Bids Awarded		12/5/2020
Construction	1/1/2021	6/30/2021