

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**MOTION FOR EXTENSION OF TIME TO PERFORM A COMPREHENSIVE
WATER AUDIT AND SUBMIT RESULTS**

Big Sandy Water District moves for an extension of time until January 31, 2021 in which to perform a comprehensive water audit and submit the audit results. In support of this Motion, Big Sandy Water District states:

1. By its Order of November 22, 2019, the Public Service Commission (“Commission”) directed Big Sandy Water District to perform a comprehensive water audit and submit the result of this audit to the Commission by May 22, 2020. On April 7, 2020, the Commission extended to September 22, 2020 the time period in which to submit the audit results.

2. Big Sandy Water District has approached the Kentucky Water Resources Research Institute (“KWRRRI”) for assistance in conducting the comprehensive water audit. KWRRRI is part of a nationwide association of 54 federally authorized water resource institutes and centers located at land grant universities throughout the United States. It manages a wide variety of research projects, provides technical support to its stakeholders, and educates and trains water resource specialists. Over the last four years, KWRRRI has partnered with West Virginia University through funding from the United States Department of Agriculture to address the management challenges, including financial, technical, and managerial issues, associated with many small water utilities in eastern Kentucky and West Virginia. It is currently assisting several water utilities, including some of which were the subject of this proceeding, in conducting detailed water audits.

3. KWRRRI recently agreed to assist Big Sandy Water District in conducting the required comprehensive water audit. Because of funding and staffing issues, however, KWRRRI cannot begin providing this assistance until on or about October 1, 2020.

4. KWRRRI and Big Sandy Water District will use the methodology set forth in the American Water Works Association M36 Manual “Water Audits and Loss Control Programs” to conduct the water audit. Use of this methodology to conduct a water audit is considered a best management practice for water loss control.

5. Big Sandy Water District lacks the financial and technical resources to perform a comprehensive water audit without outside assistance. Its consulting engineer has not previously performed a water audit. While it has investigated the use of an outside engineering firm that regularly performs such water audits, Big Sandy Water District has found that retaining an engineering firm to perform such an audit will be cost prohibitive.

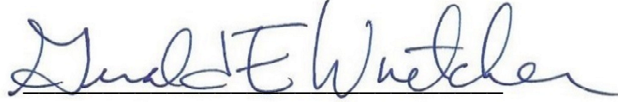
6. Extending the time period to perform the comprehensive water audit and to submit the audit results will allow KWRRRI and Big Sandy Water District sufficient time to perform the audit and to prepare a report of its results.

7. The requested extension of time is not for the purposes of delay. It will permit Big Sandy Water District to conduct a thorough review of its water loss problem at the lowest possible cost and will provide meaningful results that can be used to reduce water loss and improve operating efficiency.

WHEREFORE, Big Sandy Water District requests that the time period to perform of a comprehensive water audit and to submit its results to the Commission be extended to January 31, 2021.

Dated: August 17, 2020

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 Big Sandy Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Big Sandy Water District'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 August 17, 2020; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that within 30 days following the end of the state of emergency announced in Executive Order 2020-215 this Application in paper medium will be delivered to the Public Service Commission.



Gerald E. Wuetcher