

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**MOTION FOR EXTENSION OF TIME TO
FINALIZE REPORT AND TO SUBMIT RESULTS**

Farmdale Water District (“Farmdale District”) moves for an extension of time until May 12, 2021 in which to finalize the report of its water audit results and submit it to the Kentucky Public Service Commission (“Commission”). In support of this Motion, Farmdale District states:

1. In its November 22, 2019 Order, the Commission directed Farmdale District to perform a comprehensive water audit and submit the results of this audit to the Commission by May 22, 2020. In its April 7, 2020 Order, the Commission extended the deadline by four (4) months due to the current State of Emergency, making September 22, 2020 the deadline to submit the audit results.

2. Within a few days following the Commission’s November 22, 2019 Order, Farmdale District requested the Kentucky Rural Water Association (“KRWA”) to perform the comprehensive water audit. KRWA agreed to perform the audit and to perform other water loss detection services. Since then, Farmdale

District has been working with KRWA staff members to complete the audit. Between early December 2019 and early March 2020, KRWA staff members visited Farmdale District on several occasions and provided Farmdale District's field employees with more advanced water leak detection training.

3. Due to the ongoing COVID-19 State of Emergency and the closure of the Farmdale District office, Farmdale District recognized it would not be able to meet the September 22, 2020 deadline to submit the results of its comprehensive water audit. Farmdale District filed a Motion for Extension of Time on September 14, 2020 and requested a 91-day extension until December 22, 2020 to complete its water audit and submit the results. The Commission granted the Motion on September 18, 2020.

4. On December 18, 2020, Farmdale District requested an additional extension of time until March 22, 2021 in which to complete its comprehensive water audit and submit the audit results to the Commission. In its Motion, Farmdale District stated that additional time was needed for KRWA staff to complete its office work and more field work might be needed after the office work was finished. The Commission granted the Motion on December 23, 2020.

5. On March 22, 2021, Farmdale District requested an additional extension of time until April 21, 2021 in which to complete its comprehensive water audit and submit the audit results to the Commission. In its Motion, Farmdale

District stated that KRWA had completed all the office and field work and needed more time to analyze the data gathered during the audit and prepare and finalize the report of the water audit results. The Commission granted the Motion on April 13, 2021.

6. KRWA has indicated that the written comprehensive water audit report will be available in the next couple of weeks, but more time is needed to finalize the report. Thanks to the preliminary information provided by KRWA as part of its comprehensive water audit, Farmdale District has isolated most of its water losses to two (2) small areas within the Evergreen Pressure Zone near the Stewart Home & School (“Stewart Home”). KRWA estimated that these two (2) areas are the source of water losses in the range of 200 gallons per minute. This equates to approximately 288,000 gallons per day or **8,640,000** gallons per month.

7. One of these areas is the water distribution line that runs along Demerson Lane. Demerson Lane and the water line are approximately 0.75 miles long and are located just west of U.S. Highway 127 near the Franklin-Anderson County Line. Both Demerson Lane and the water line run parallel to U.S. Highway 127. This water line was constructed in the early 1970’s and is approximately 50 years old. It is a 3-inch diameter water line that is “thin-walled” and is very brittle. It is a Class 160 PVC pipe that has the appearance of gray electrical conduit. Farmdale District staff has repaired four (4) leaks on the Demerson Lane water line

within the past two (2) weeks. Apparently, it was constructed in a very rocky area and some rock has been placed over the pipe as well.

8. Farmdale District staff now believes that replacement of the Demerson Lane water line is its top priority. KRWA has estimated that the Demerson Lane water line may account for as much as 100 gallons per minute (or **4,320,000** gallons per month) of Farmdale's water loss. Farmdale District staff plans to recommend to its Board of Commissioners that this water line be replaced. It has instructed its consulting engineering firm to prepare a cost estimate for replacing this line. Replacement of the Demerson Lane water line was not listed as one of the seven (7) potential projects that were identified in Farmdale District's Motion for a Surcharge filed on April 13, 2020 in Case No. 2020-00021 nor in its Motion for an Extension of Time filed on December 21, 2020 in Case No. 2020-00217. Nevertheless, it now appears to be the highest priority project for reducing Farmdale District's excessive water loss. This project and other water loss reduction projects will be outlined in the written comprehensive water audit report.

9. Extending the time period by 21 days will allow KRWA sufficient time to finalize the report of Farmdale District's water audit results and submit it to the Commission.

WHEREFORE, Farmdale District requests an extension of time until May 12, 2021 in which to finalize the report of its water audit results and submit it to the Commission.

Dated: April 20, 2021

Respectfully submitted,



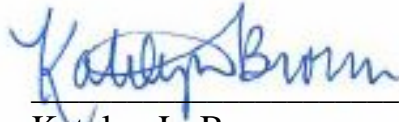
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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001 Section 8(7) and the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085, this is to certify that Farmdale Water District's electronic filing was transmitted to the Commission on April 20, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a physical copy of the filing will be submitted to the Commission once the State of Emergency has ceased.



Katelyn L. Brown