COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO)EXCESSIVE WATER LOSS BY)KENTUCKY'S JURISDICTIONAL)WATER UTILITIES)

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

Farmdale Water District ("Farmdale District") moves for an extension of time until March 22, 2021 in which to complete its comprehensive water audit and to submit the audit results. In support of this Motion, Farmdale District states:

1. In its November 22, 2019 Order, the Public Service Commission (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 Manager 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. KRWA staff has confirmed that KRWA has done all the outside field work that they can do until they spend four (4) or five (5) more days in Farmdale District's office. Because of the ongoing COVID-19 health concerns, the KRWA staff working on the Farmdale District water audit have not visited the Farmdale District office to conduct the remaining review and analysis of information, including billing records, water usage records, and zone meter reading data, that is located inside the office. Farmdale District's lobby is still closed to the public. It is not known when KRWA employees will be able to safely work inside the Farmdale District office. 5. In its September 14, 2020 Motion, Farmdale District stated it was "exploring other options" for KRWA to obtain the needed information and records without spending several days inside the office, but no alternative has been discovered because the remaining work to be conducted by KRWA staff, such as analyzing the billing software system, can only occur inside the office. Additionally, after the work inside the office is completed, KRWA staff may need to conduct more field work.

6. Extending the time period to perform the comprehensive water audit and to submit the audit results by 90 days will hopefully allow KRWA sufficient time to finish the audit and to prepare a report of its results. The requested extension will provide Farmdale District with meaningful results that can be used to reduce water loss and improve operating efficiency. WHEREFORE, Farmdale District requests an extension of time until March 22, 2021 in which to complete its comprehensive water audit and submit the audit results to the Commission.

Dated: December 18, 2020

Respectfully submitted,

Brown

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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 December 18, 2020; 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