

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>ELECTRONIC INVESTIGATION INTO</b>	)	
<b>EXCESSIVE WATER LOSS BY KENTUCKY'S</b>	)	<b>Case No. 2019-00041</b>
<b>JURISDICTIONAL WATER UTILITIES</b>	)	

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**WEST CARROLL WATER DISTRICT'S MOTION FOR EXTENSION OF TIME**

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Comes now West Carroll Water District ("West Carroll"), by and through the undersigned counsel, and requests an extension of time to file the documents requested in the Commission's November 22, 2019 Order. As grounds for this motion West Carroll respectfully states as follows:

The Commission's Order required certain information to be filed within six months from the date of the Order. Specifically, this information includes the following:

- Plans to improve the operations and financial health of the utility;
- New policies and procedures to address water loss and better business practices, including but not limited to a water loss reduction plan, a leak detection plan and improved employee policies and procedures;
- Revised leak adjustment policy; and
- Written report on the merger discussion status.

Exhibit K to the Commission's Order stated that West Carroll should undertake discussions with Carrollton Utilities regarding a merger or consolidation. Since the date of the Order, West Carroll and Carrollton Utilities have had multiple discussions regarding a merger or consolidation of West Carroll into Carrollton Utilities. West Carroll believes that its time over the next few

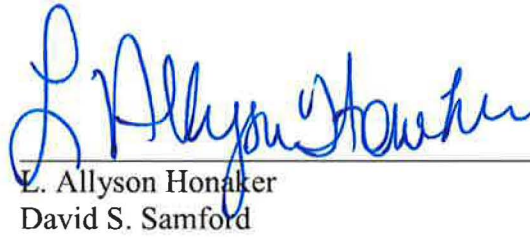
months would be well spent having further merger discussions with Carrollton Utilities and other necessary entities negotiating the details of such merger or consolidation.

To date there have been numerous discussions with West Carroll board members, Commissioners, the mayor, city council members and county judge. There have also been two joint meetings of West Carroll and Carrollton Utilities' boards. Most recently there has been a meeting involving the mayor, the new Department of Local Government Commissioner Keene, the Executive Director of Kentucky Infrastructure Authority, Edith Halbleib and Representative Rick Rand to discuss any potential loan forgiveness or available grant money to monetarily assist in a merger or consolidation of West Carroll and Carrollton Utilities.

The documents required to be filed by West Carroll pursuant to the Commission's Order are very time consuming to develop. Furthermore, if the merger negotiations are successful and West Carroll and Carrollton Utilities consolidate, West Carroll customers would then be under the policy and procedures of Carrollton Utilities. Having West Carroll go through the time and expense of developing these documents when they may change again if the merger discussions are successful would seem to create some customer confusion as to the policies and procedures in place if a merger were to occur in the near future. West Carroll proposes the requested extension in order to continue merger discussions and should have a much better idea of the merger discussions over the next several months if a merger will occur.

Therefore, West Carroll would request a four month extension to September 22, 2020 to provide the documentation ordered by the Commission. West Carroll will continue to file updates with the Commission regarding the merger discussions.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, this is to certify that the electronically filed documents (including this “Read1st” letter and its enclosures) are true and accurate copies of the same documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 3, 2020 that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means; and that the original versions of the documents transmitted electronically will be filed with the Commission in paper medium within two business days from the date of the electronic filing.



*Counsel for West Carroll Water District*