

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC GRAVES COUNTY WATER |) | |
| DISTRICT'S UNACCOUNTED-FOR WATER |) | CASE NO. |
| LOSS REDUCTION PLAN, SURCHARGE, |) | 2019-00347 |
| AND MONITORING |) | |

**MOTION FOR EXTENSION OF TIME TO
SUBMIT YEARLY REPORT AND TEMPORARY SUSPENSION
OF MONTHLY REPORTING REQUIREMENTS**

Pursuant to 807 KAR 5:001, Section 5, Graves County Water District (“Graves District”) moves for an extension of time until April 15, 2022 to submit its yearly report on the progress of its water loss detection and repair program and for a temporary suspension of the requirement to submit monthly reports on water loss and on water surcharge collections and their use. It also requests a similar extension of time to respond to Commission Staff’s Request for Information of December 6, 2021.

In support of its Motion, Graves District states:

1. By its Order of September 30, 2019 in Case No. 2018-00429,¹ the Public Service Commission authorized Graves District to collect a monthly surcharge of \$5.00 per customer for service rendered on and after October 1, 2019 and continuing for 72 months or until the total amount of the surcharge assessed equaled \$1,721,600, whichever occurred first, subject to certain conditions. These conditions including the submission of monthly water loss reports, monthly activity reports on the collection and use of surcharge proceeds, and an annual report containing a

¹ *Application of Graves County Water District for an Alternative Rate Adjustment*, Case No. 2018-00429 (Ky. PSC Sept. 30, 2019). The conditions set forth in that Order regarding the collection of the surcharge were restated in the Public Service Commission’s Order of September 30, 2020 in this docket.

schedule of the estimated and actual progress of Graves District's water loss detection and repair program and the estimated and actual expenditures made with surcharge proceeds.

2. Graves District has made timely submission of the various written monthly reports required by the Order of September 30, 2019. After being granted an extension of time,² it timely submitted the required annual report.

3. On December 10, 2021, a series of powerful tornados struck western Kentucky, including Graves County, causing significant property damage and resulting in scores of deaths and injuries. Graves District's water distribution facilities were significantly affected. The water production and distribution facilities of Mayfield Electric and Water Systems ("MEWS"), which supplies water to Graves District and operates and manages Graves District's distribution system, also suffered extensive damage. MEWS's offices, which are located in downtown Mayfield, were extensively damaged and required office activities to be diverted to a portable office.

4. At the current time, MEWS and Graves District are devoting their full attention to the restoration of utility service and repair of storm damage. Graves District is not in a position to prepare and submit the required monthly reports or annual report.³ It requests that the Public Service Commission temporary suspend Graves District's obligation to submit monthly water loss and activity reports until April 15, 2022 and that such suspension include the report for the month of November 2020, which Graves District was required to submit on or before December 15, 2021. If the requested suspension is granted, Graves District will submit these reports to the Public Service Commission on or about April 15, 2022.

5. Similarly, Graves District requests that the time period to submit its annual surcharge report be extended to April 15, 2022. This report must contain a schedule of the

² See Order of December 11, 2020.

³ MEWS personnel who are involved in Graves District's operation and management prepare the required reports.

estimated and actual progress of Graves District's water loss detection and repair program and the estimated and actual expenditures made with surcharge proceeds. Current conditions justify the requested extension. Furthermore, the additional time will permit Graves District to include in its report an assessment of the effects of the damage on its water loss detection and repair program.

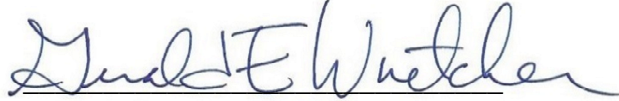
4. On December 6, 2021, the Commission Staff issued a request for information regarding Graves District's water loss report for the month of November 2021. A response to this request is due on January 4, 2022. For the same reasons set forth above, Graves District requires an extension of time until April 15, 2022 to submit its response to the request.

5. This request is made in good faith and not for the purposes of delay. It results from the damage of the December 10, 2021 tornadoes, which Governor Beshear has described as one of the worst natural disasters in the Commonwealth's history

WHEREFORE, Graves District requests that (1) the requirement to submit monthly reports on water loss and on water surcharge collections and their use as set forth in the Order of September 30, 2019 be temporarily suspended until April 15, 2022; (2) the time in which it may submit the yearly report required by the Order of September 30, 2019 be extended to April 15, 2022; and (3) the time to respond to Commission Staff's Request for Information dated December 6, 2021 be extended to April 15, 2022.

Dated: December 20, 2021

Respectfully submitted,

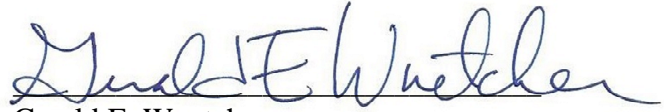


Gerald E. Wuetcher
gerald.wuetcher@skofirm.com
Stoll Keenon Ogden PLLC
300 West Vine St. Suite 2100
Lexington, Kentucky 40507-1801
Telephone: (859) 231-3000
Fax: (859) 259-3517

Counsel for Graves County Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, and the Public Service Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was transmitted to the Public Service Commission on December 20, 2021 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.



Gerald E. Wuetcher