## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| PROPOSED FILING OF GREEN RIVER     | ) |                     |
|------------------------------------|---|---------------------|
| VALLEY WATER DISTRICT TO AMEND ITS | ) | CASE NO. 2020-00026 |
| TARIFF                             | ) |                     |

## MOTION FOR EXTENSION OF TIME

Green River Valley Water District ("Green River District") moves for an extension of time until August 24, 2020 to submit its responses to Commission Staff's Fifth Request for Information. In support of its Motion, Green River District states:

- 1. Following the issuance of Commission Staff's Fifth Request for Information, Green River District reviewed the record of the proceedings in this matter and authorized its counsel to initiate discussions with Commission counsel regarding the issues presented in this proceeding and in two related proceedings Cases No. 2019-00258¹ and No. 2019-00375². Counsel for Green River District and Commission counsel conducted a video conference call on July 8, 2020. Green River District's counsel subsequently reported those discussions to Green River District's Board of Commissioners.
- 2. On July 16, 2020, Green River District's Board of Commissioners authorized its counsel to file a motion to withdraw the proposed tariff revision that is the subject of this proceeding. In support of its motion, Green River District will submit its proposed policy for addressing low water pressure complaints. This policy will expressly state that, in those instances in which the installation of an individual pressure pump is required to ensure a customer has

Stuart I. Gross, Sr. v. Green River Valley Water District, Case No. 2019-00375 (Ky. PSC filed June 11, 2019).

<sup>&</sup>lt;sup>2</sup> Tracy Kay Sanders v. Green River Valley Water District, Case No. 2019-00375 (Ky. PSC filed Oct. 2, 2019).

adequate water pressure, Green River District will be responsible for installing, maintaining and repairing the pump and, should the pump fail for any reason other than the result of the customer's gross negligence or willful misconduct, replacing the pump.

- 3. Green River District's Board of Commissioners further authorized the filing of offers of settlement in Cases No. 2019-00258 and No. 2019-00375. In the offer of settlement to be filed in Case No. 2019-00258, Green River District will offer to construct a booster pumping station of sufficient capacity in the Bunnell Crossing Road area of Munfordville, Kentucky to alleviate the low-pressure conditions in this area and to eliminate the need for individual booster pumps for Green River District customers in this area,<sup>3</sup> In Case No. 2019-00375, Green River District will offer, at a minimum, to install an individual pump at the Complainant's residence at its expense and in accordance with the terms of its proposed policy for addressing low pressure complaints.<sup>4</sup>
- 4. Green River District respectfully submits that its proposed actions are likely to resolve these proceedings in a less costly, more expeditious and more efficient manner and achieve a result that is consistent with the Commission's regulations and acceptable to all parties and to the Commission.
- 5. Green River District proposes to file its motion to withdraw and the offers of settlement no later than August 24, 2020. With these pleadings, it will provide detailed information regarding the proposed booster station and proposed individual pump, as well as the proposed policy regarding low water pressure complaints. Based upon its discussions with Commission counsel, it also recognizes that the information requested in Commission Staff's Fifth Request for

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Currently there are four Green River District customers in this area that have individual pressure pumps.

<sup>&</sup>lt;sup>4</sup> Green River District is continuing to explore alternative solutions to reduce or alleviate pressure problems in the Baumgardner Road area of Bonnieville, Kentucky.

Information will be necessary for the Commission's review of the motion to withdraw and the offers of settlement. Green River District estimates that an additional month is needed to assemble the requested information, and to prepare the necessary pleadings and supporting documents.

6. This request is made in good faith and not for purposes of delay.

WHEREFORE, Green River Valley Water District requests that the Commission enter an Order extending the time for responses to Commission Staff's Fifth Request for Information to August 24, 2020.

Dated: July 24, 2020 Respectfully submitted,

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## CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Green River Valley 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 July 24, 2020; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that that within 30 days following the termination of the state of emergency declared in Executive Order 2020-215, this Motion in paper medium will be delivered to the Public Service Commission.

Gerald E. Wuetcher