

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 LEAVE TO WITHDRAW TARIFF SHEET

Green River Valley Water District (“Green River District”) moves for leave to withdraw its proposed tariff sheet. In support of its Motion, Green River District states:

1. On December 11, 2019, Green River District filed with the Public Service Commission a revised tariff sheet containing rules to establish its responsibilities and those of its existing customers and applicants for service when it is unable to provide water service at a pressure at or above 30 pounds per square inch gauge (“psig”) at the metering point. Green River District proposed to place these regulations into effect on February 1, 2020.

2. On January 31, 2020, the Public Service Commission suspended the operation of the proposed rules for five months and initiated this proceeding to review the proposed rules.

3. On February 12, 2020, the Public Service Commission directed that Cases No. 2019-00258¹ and No. 2019-00375,² which involve formal complaints in which the Complainants alleged that Green River District was providing water service at pressures below 30 psig, be held in abeyance pending completion of its review in this proceeding.

4. On August 19, 2020, Green River District’s Board of Commissioners adopted a policy on water pressure that differs significantly from the proposed rules and renders them

¹ *Stuart I. Gross v. Green River Valley Water District*, Case No. 2019-00258 (Ky. PSC filed June 11, 2019).

² *Tracy Kay Sanders v. Green River Valley Water District*, Case No. 2019-00375 (Ky PSC filed Oct. 2, 2019)

obsolete. See Green River Valley Water District's Response to Commission Staff's Fifth Request for Information, Attachment 12.

a. The proposed rules required Green River District to install at its expense an individual booster pump to serve an existing customer if, without such pump, water pressure at the meter point would fall below 30 psig, to warrant the operation of the pump for one year after installation and to repair or replace the pump if it failed within the first year of operation. The proposed rules limited Green River District's responsibilities for the pump to its first year of operation.

b. The proposed rules also relieved Green River District of any obligation to provide water service to an applicant for water service if service could not be provided at 30 psig at the metering point unless the applicant for service agreed to install and maintain at the applicant's expense an individual pump capable of ensuring a water pressure of 30 psig at the metering point.

c. In contrast, Green River District's "Policy on Water Pressure" places responsibility on Green River District to install and maintain **at its expense** any equipment or facilities necessary to ensure that an existing customer continues to receive water service within the pressure range established by Public Service Commission Regulations and that such responsibility extends to the replacement of such equipment **at its expenses** when that equipment fails (unless the failure is the result of the customer's negligence or misconduct). It further provides that, if water service cannot be provided to an applicant for service at the minimum permissible water pressures established by the Commission and the Kentucky Division of Water unless an individual pump is installed at the applicant's location, Green River District will install

such pump **at its own expense** and assume responsibility for the pump's maintenance and replacement until the pump is no longer necessary to provide the required water pressure.

5. Simultaneous with the submission of this Motion, Green River District has submitted Offers of Settlement in Cases No. 2019-00258 and No. 2019-0375.

a. Case No. 2019-00258. Green River District proposes to construct approximately two miles of three-inch polyvinyl chloride water main at the estimated cost of \$50,000 to connect Edmonson County Water District's ("Edmonson District") distribution system to Green River District's distribution system near the Baumgardner Road area of Bonnieville, Kentucky. Upon completion of the proposed construction, Edmonson District's water storage tank near Kessinger, Kentucky will gravity feed into Green River District's distribution system. Because the Edmonson District water storage tank has an overflow elevation of 1082 feet mean sea level, which is 153 feet higher than the overflow elevation of Green River District's Bonnieville Water Storage Tank, water pressure at the Complainant's location under static conditions is expected to increase to 85 psig, thus eliminating the Complainant's need for an individual pump.

b. Case No. 2019-00375. Green River District proposes to construct a booster pumping station near Bunnell Crossing Road in Munfordville, Kentucky to increase water pressures to all customers along that road. The estimated cost of the proposed booster station is approximately \$110,000. Upon completion of the booster pump station, customers along Bunnell Crossing Road should receive water service at pressures between 45 and 50 psig, thus eliminating the need for customers' use of individual pumps.

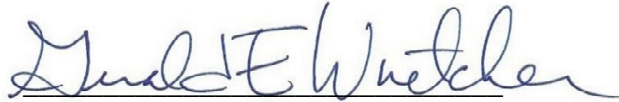
6. As the proposed tariff revision is no longer consistent with Green River District's policies and is neither necessary or appropriate for the performance of Green River District's

provision of water service to the public, the proposed tariff should be removed from further consideration.

WHEREFORE, Green River Valley Water District requests that it be permitted to withdraw its proposed tariff sheet and that the proceeding and the Commission's review of the proposed tariff be closed.

Dated: August 24, 2020

Respectfully submitted,

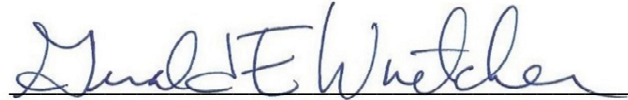


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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Green River Valley Water District's electronic filing of this Response 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 August 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 within 30 days following the end of the state of emergency announced in Executive Order 2020-215 this Response in paper medium will be delivered to the Public Service Commission.



Counsel for Green River Valley Water District