## **COMMONWEALTH OF KENTUCKY**

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PURCHASED WATER	)	
ADJUSTMENT FILING OF NICHOLAS	)	CASE NO. 2020-00145
COUNTY WATER DISTRICT	)	

## MOTION FOR EXTENSION OF TIME

Nicholas County Water District ("Nicholas District") moves for an extension of time through December 15, 2021 in which to file its Alternative Rate Filing ("ARF") Application with the Kentucky Public Service Commission's ("Commission"). In support of this Motion, Nicholas District states:

- 1. In its May 11, 2020 Order, the Commission directed Nicholas District to "file an application for a traditional adjustment in rates or an alternative rate adjustment within one year of the date of entry of this Order."
- 2. Nicholas District plans to file an ARF Application with the Commission and requests an extension through December 15, 2021 to do so.
- 3. Good cause exists for the Commission to grant this extension. Neither Nicholas District's office staff nor any other employee has the knowledge or experience to file an ARF Application. Nicholas District was planning on Kentucky Rural Water Association ("KRWA") performing the necessary Rate Study and preparing the ARF Application. Unfortunately, KRWA recently informed Nicholas

District that it is "booked solid" through December 31, 2021 and cannot commit to performing any more Rate Studies or filing any more ARF Applications until 2022.

- 4. Since then, Nicholas District has made inquiries to other rate consultants and engineering firms in an effort to retain their services to prepare and file the ARF Application. None of these firms are available for several more months. The undersigned attorneys recently contacted Kim Padgett with the Rural Community Assistance Program ("RCAP") on behalf of Nicholas District to retain its services to perform the Rate Study and to prepare and file the ARF Application. RCAP is optimistic that it will be able to perform these services later this year, but because of its current workload, it might be the fourth quarter of 2021 before the ARF Application can be filed. RCAP has committed itself, however, to completing and filing the ARF Application by no later than December 15, 2021.
- 5. Nicholas District has already filed its Annual Report and its Audit Report with the Commission for the 2020 calendar year. This will be the historic test year on which its ARF Application will be based.
- 6. Extending the deadline for Nicholas District to file a traditional adjustment in rates or an alternative rate adjustment to December 15, 2021 will allow Nicholas District sufficient time to prepare and file an ARF Application.

WHEREFORE, Nicholas District respectfully requests that the Commission grant its request for an extension of time until December 15, 2021 in which to file an ARF Application with the Commission.

Dated: June 23, 2021

Respectfully submitted,

Mary Ellen Wimberly

Stoll Keenon Ogden PLLC

300 West Vine Street, Suite 2100

Mary Ellen Winberly

Lexington, Kentucky 40507-1801

Telephone: (859) 231-3047

Fax: (859) 246-3647

maryellen.wimberly@skofirm.com

Damon R. Talley

Stoll Keenon Ogden PLLC

P.O. Box 150

Hodgenville, KY 42748-0150

Telephone: (270) 358-3187

Fax: (270) 358-9560

damon.talley@skofirm.com

Counsel for Nicholas County Water District

## **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 Nicholas County Water District's electronic filing was transmitted to the Commission on June 23, 2021; 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.

Many Ellen Wenbely
Counsel for Nicholas County Water District