COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC FARMDALE WATER)
DISTRICT'S UNACCOUNTED-FOR) CASE NO. 2020-00217
WATER LOSS REDUCTION PLAN,)
SURCHARGE AND MONITORING)

MOTION FOR EXTENSION OF TIME TO FILE ITS QUALIFIED INFRASTRUCTURE IMPROVEMENT PLAN

Farmdale Water District ("Farmdale District") moves for an extension of time until June 21, 2021 in which to complete and file its Qualified Infrastructure Improvement Plan ("QIIP"). In support of this Motion, Farmdale District states:

- 1. In its July 7, 2020 Order in Case No. 2020-00021, the Public Service Commission (the "Commission") directed Farmdale District to file a QIIP within 120 days of the Order. This requirement was also included in the July 7, 2020 Order in Case No. 2020-00217, which was initiated by the Commission to monitor the unaccounted-for water loss reduction plan surcharge granted in Case No. 2020-00021. On December 23, 2020 the Commission granted Farmdale District's Motion for Extension of Time until April 20, 2021 to file its QIIP.
- 2. Farmdale District has not yet developed its QIIP because Kentucky Rural Water Association ("KRWA") has just recently completed its comprehensive water audit, which was ordered in Case No. 2019-00041. As discussed in Farmdale

District's Motions for Extensions of Time filed on September 14, 2020, December 18, 2020, and March 22, 2021 in Case No. 2019-00041, the ongoing COVID-19 health concerns and closure of the Farmdale District office delayed KRWA staff from physically visiting the Farmdale District office to conduct the remaining review and analysis of information, including billing records, water usage records, and zone meter reading data, that were located inside the office. Additionally, subsequent field work necessary to complete the comprehensive water audit was delayed because of inclement weather in February and March. KRWA staff have recently completed the comprehensive water audit but have not yet completed the written report of the comprehensive audit water results. KRWA staff expect to finish the written report of the audit results in the next couple of weeks.

3. The comprehensive water audit report for Case No. 2019-00041 should be completed before the QIIP is filed because one of the results of the water audit will be a comprehensive unaccounted-for water loss reduction plan. The water loss reduction plan will recommend system improvements and priorities for Farmdale District's Board of Commissioners to consider in developing its QIIP. In its Motion for Surcharge filed on April 13, 2020 in Case No. 2020-00021 and in its Motion for Extension of Time filed on December 21, 2020 in this case, Farmdale District identified potential projects to be undertaken to reduce Farmdale District's water loss. The priority of these projects is likely to change as a result of the

comprehensive water audit and what Farmdale District has discovered based on the water audit. For example, preliminary results of KRWA's comprehensive water audit have indicated that most of Farmdale District's water loss can be attributed to two (2) small areas within the Evergreen Pressure Zone near the Stewart Home & School. Farmdale District staff believes that replacement of one of the water distribution lines within the Evergreen Pressure Zone will be its top priority. Replacement of this particular water line was not one of the earlier identified projects. Additionally, the comprehensive water audit report may recommend other activities or system improvements to eliminate sources of unaccounted-for water losses.

- 4. Farmdale District is requesting a 62-day extension of time from today's date to file its QIIP because Farmdale District will need time after KRWA completes its comprehensive water audit report to develop and file its QIIP. KRWA staff expects to finish the written report of the audit results in the next couple of weeks.
- 5. Farmdale District has complied with all other requirements contained in the Ordering paragraphs of the Commission's July 7, 2020 Order in Case No. 2020-00217. Farmdale District has been faithfully and timely filing its water loss reports and surcharge activity reports each month, as directed by the Commission in its July 7, 2020 Order. Farmdale District has collected its Surcharge fees and

deposited those fees in a separate, interest-bearing account, which has a balance of \$44,416.64 as of March 31, 2021. No funds have been spent to date.

WHEREFORE, Farmdale District requests an extension of time until June 21, 2021 in which to complete and file its Qualified Infrastructure Improvement Plan.

Dated: April 19, 2021

Respectfully submitted,

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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 Farmdale Water District's electronic filing was transmitted to the Commission on April 19, 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.

Katelyn L. Brown