

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 August 30, 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. On April 19, 2021, Farmdale District requested an additional extension of time until June 21, 2021 to file its QIIP.

3. 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, and has not yet finalized its audit report. As discussed in Farmdale District’s Amended Motion for Extension of Time filed on June 3, 2021 in Case No. 2019-00041, Farmdale District has determined that additional time is needed to finalize the report of its comprehensive water audit and to submit the report to the Commission. Over the past 2 months, KRWA employees have made numerous trips to Farmdale District to assist Farmdale District staff in locating large leaks and reducing the size of the areas where the large leaks are located. However, KRWA employees have been extremely busy assisting other utility systems, particularly due to the backlog of work resulting from the COVID19 pandemic, and have not yet finalized Farmdale District’s comprehensive water audit report. In Farmdale District’s Amended Motion for Extension of Time filed on June 3, 2021 in Case No. 2019-00041, Farmdale District requested until July 30, 2021 in which to finalize the report of its water audit results and submit it to the Commission.

4. 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 Extension of Time to Finalize Report and to Submit Results filed on April 20, 2021 in Case No. 2019-00041, Farmdale District stated preliminary findings and the priority of certain projects based on those preliminary findings. 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. Additionally, the comprehensive water audit report may recommend other activities or system improvements to eliminate sources of unaccounted-for water losses.

5. Farmdale District is requesting a 70-day extension of time from today's date (until August 30, 2021) to file its QIIP because Farmdale District will need time after KRWA completes its comprehensive water audit report to develop and file its QIIP. In Farmdale District's Amended Motion for Extension of Time filed on June 3, 2021 in Case No. 2019-00041, Farmdale District requested until July 30, 2021 in which to finalize the report of its water audit results and submit it to the Commission. Granting Farmdale District until August 30, 2021 to file its QIIP will allow Farmdale District approximately 30 days to review the water audit results and report and to develop its QIIP.

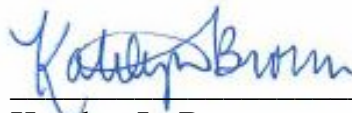
6. Farmdale District has complied with all other requirements contained in the Ordering paragraphs of the Commission's July 7, 2020 Order in Case No. 2020-00217. Farmdale District has been faithfully and timely filing its water loss

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 \$59,726.80 as of May 31, 2021. No funds have been spent to date.

WHEREFORE, Farmdale District requests an extension of time until August 30, 2021 in which to complete and file its Qualified Infrastructure Improvement Plan.

Dated: June 21, 2021

Respectfully submitted,



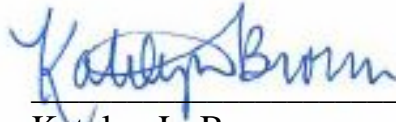
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Counsel for Farmdale Water District

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 Farmdale Water District's electronic filing was transmitted to the Commission on June 21, 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