

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 April 20, 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.

2. Farmdale District has not yet developed its QIIP because Kentucky Rural Water Association (“KRWA”) has not 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 and

December 18, 2020 in Case No. 2019-00041, the ongoing COVID-19 health concerns have prevented 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 is located inside the office. KRWA staff still need approximately four (4) or five (5) more days to complete the work inside the office, and KRWA staff may need additional time to conduct more field work after the office work is completed.

3. The comprehensive water audit 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. As discussed in Farmdale District's Motion for Surcharge filed on April 13, 2020 in Case No. 2020-00021, Farmdale District has been working with KRWA and HMB Professional Engineers, Inc. to identify potential projects that could be undertaken to reduce Farmdale District's water loss, including: (1) the purchase of more sophisticated leak detection (listening device) equipment; (2) the purchase and installation of additional zone meters; (3) the purchase of a flow meter; (4) the purchase and installation of additional bypass meters; (5) the purchase and installation of additional isolation valves; (6) the replacement of old, brittle Blue

Max tubing service lines; and (7) the replacement of approximately 0.5 mile of 6-inch diameter AC transmission main. Some or most of these projects may be included in the water loss reduction plan, which may be considered for inclusion in its QIIP, but this will not be known until the comprehensive water audit is completed in Case No. 2019-00041. Additionally, the comprehensive water audit may recommend other activities or system improvements to eliminate sources of unaccounted-for water losses.

4. Farmdale District is requesting a 120-day extension of time from today's date to file its QIIP because Farmdale District will need at least 30 days after KRWA completes its comprehensive water audit to develop and file its QIIP. Farmdale District's Motion for Extension of Time filed on December 18, 2020 in Case No. 2019-00041 requests until March 22, 2021 to complete its comprehensive water audit and submit the results to the Commission.

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 \$21,458.63 in Surcharge fees and deposited those fees in a separate, interest-bearing account. No funds have been spent to date.

WHEREFORE, Farmdale District requests an extension of time until April 20, 2021 in which to complete and file its Qualified Infrastructure Improvement Plan.

Dated: December 21, 2020

Respectfully submitted,



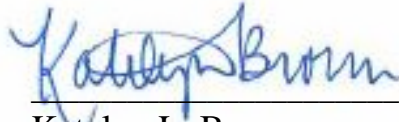
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CERTIFICATE OF SERVICE

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 December 21, 2020; 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