

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF THE)
BARKLEY LAKE WATER DISTRICT FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY TO CONSTRUCT A)
SYSTEM IMPROVEMENTS PROJECT AND) CASE NO. 2020-00255
AN ORDER APPROVING A CHANGE IN)
RATES AND AUTHORIZING THE ISSUANCE)
OF SECURITIES PURSUANT TO KRS 278.023)**

MOTION FOR EXTENSION OF TIME

Barkley Lake Water District (“Barkley Lake 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 (“Commission”). In support of this Motion, Barkley Lake District states:

1. In its September 2, 2020 Order, the Commission directed Barkley Lake District to “file an application for a traditional adjustment in rates or an alternative rate adjustment within one year of the date of filing of this Order.”

2. Barkley Lake District plans to file an ARF Application with the Commission and requests an extension through December 15, 2021 to do so.

3. When the Commission’s Order dated September 2, 2020 was issued and reviewed by the General Manager of Barkley Lake District, he thought that he

could complete the ARF forms and file the rate case himself. The General Manager also thought that because of the rate increase granted by the Commission in Case No. 2020-00255, Barkley Lake District would probably not need another rate increase so soon. He assumed that he would just need to fill out a few of the ARF forms and file it with the Commission to demonstrate that no additional increase would be needed. He now realizes that completing the ARF Forms, making the necessary adjustments, performing the Billing Analysis, etc. is too daunting a task for him to undertake without assistance. Neither Barkley Lake District's General Manager, office staff, nor any other employee has the knowledge or experience to file an ARF Application.

4. Barkley Lake District then contacted Kentucky Rural Water Association ("KRWA") on August 10, 2021 and requested KRWA perform the necessary Rate Study and prepare the ARF Application. Unfortunately, KRWA informed Barkley Lake 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.

5. Since then, Barkley Lake 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 Partnership (“RCAP”) on behalf of Barkley Lake 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.

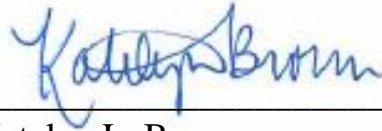
6. Barkley Lake District just recently filed its Annual Report and its Audit Report with the Commission for the 2020 calendar year. This will be the historic test year on which its ARF Application will be based.

7. Based on the foregoing, good cause exists for the Commission to grant this extension. Extending the deadline for Barkley Lake District to file an alternative rate adjustment to December 15, 2021 will allow Barkley Lake District, with the assistance of RCAP, sufficient time to prepare and file an ARF Application.

WHEREFORE, Barkley Lake 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: August 17, 2021

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on August 17, 2021; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



Katelyn L. Brown