COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC PURCHASED WATER ADJUSTMENT FILING OF BATH COUNTY WATER DISTRICT

CASE NO. 2022-00067

MOTION OF BATH COUNTY WATER DISTRICT FOR EXTENSION OF TIME TO FILE A TRADITIONAL RATE ADJUSTMENT APPLICATION

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Comes now Bath County Water District, by and through counsel and moves the Commission for an extension of time to file an application for a traditional rate adjustment or an alternative rate adjustment as Ordered by the Commission herein on March 30th, 2022. In support of this Motion Bath County Water District would note the following:

On March 1st, 2022 Bath County Water District filed an Application for Purchased Water Adjustment.

On March 30th, 2022 the Commission entered an Order approving rates for Bath County Water District. Additionally, the Commission ordered Bath County Water District to "file an application for a general rate adjustment pursuant to 807 KAR 5:001, Section 16, or an application for an alternative rate adjustment pursuant to 807 KAR 5:076, or in the alternative, file a formal motion with a detailed analysis of its rates and revenues and a statement explaining the reasons why no modifications are necessary, within six months of the date of issuance of this Order."

The Commission's basis for requiring an application for rate adjustment is that Bath County Water District's last rate case was in 2012, and as a result Bath County Water District has not had a comprehensive review of its financial records and operational structure for nine years.

Bath County Water District requests an extension of time of three months to file the application for rate adjustment. The Bath County Water District General Manager has recently retired, and a new General Manager hired. Bath County Water District is currently in the construction process of a substantial KIA project. Bath County Water District has procured the services of Kentucky Engineering Group to assist in the rate case. Bath Water anticipates filing an application for an alternative rate adjustment. However, Bath Water in conjunction with Kentucky Engineering Group anticipate that an additional three months is required to prepare and file the application, and that it will be filed before the end of the 2022 calendar year. WHEREFORE, Bath County Water District respectfully requests an extension of time to file the traditional Application for Rate Adjustment of three month days, until December 31st, 2022.

Dated this 30th day of June, 2022.

Respectfully submitted,

Earl Rogers III Campbell Rogers & Stacy PLLC 154 Flemingsburg Road Morehead, KY 40351 (606) 783-1012 Fax (606) 784-8926 <u>earl@campbellrogers.com</u> Counsel for Bath County Water District

CERTIFICATE OF SERVICE AND FILING

The undersigned certifies that the electronic filing has been transmitted to the Commission on June 30th, 2022; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

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Earl Rogers III Counsel for Bath County Water District