

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

PSC Case 2022-99

In Re Matter of:

ELECTRONIC APPLICATION OF	)	CASE
SOUTHERN WATER & SEWER DISTRICT	)	NO.
FOR AN ALTERNATIVE RATE ADJUSTMENT	)	2022-99

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MOTION TO CONTINUE HEARING  
SCHEDULED FOR 9/16/22

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Comes Southern Water and Sewer District “Southern”, by and through counsel, and for its motion to continue the hearing currently scheduled for September 16, 2022 states as follows;

As the Public Service Commission should be aware, devastating and historic flooding occurred in Southern’s service area in late July of 2022. This extreme weather event caused severe damage to much of the region and to Southern’s water distribution infrastructure. Due to the extent of damages resulting from this flood, Governor Beshear issued an Executive Order (2022-457) proclaiming a state of emergency in Kentucky due to a severe weather system that generated multiple rounds of heavy torrential rain, creating flooding, flash flooding, mudslides and landslides. This weather event resulted in dangerous conditions and damage to public infrastructure, utility distribution systems and private property and endangered public health, safety and public and private property.

When this flooding occurred, Southern was in the process of finishing up dealing

with a FEMA declared weather event, Disaster 4643DR. This event resulted from damages caused by storms and flooding that occurred during the last few days of December 2021. Southern was receiving bids and finishing up the required paperwork for FEMA to repair damages resulting from the December 2021 storms when the Flooding of Late July 2022 occurred.

The recent flooding has added substantial more work to repair damages resulting from the flood in addition to substantial more paperwork related to FEMA regarding this flooding event. The bulk of this work will be performed by Mr. Randy Conley as well as Paula Burke. As the Public Service Commission is aware, these two workers have been requested to appear and testify at the hearing currently scheduled for September 16, 2022. Southern hereby requests that the hearing be continued for at least 60 days so that Mr. Conley and Ms. Burke can devote their attention to the required FEMA paperwork and recovery from the recent flood and not be distracted by the September 16, 2022 hearing.

**Wherefore**, Southern hereby requests PSC approval to continue the hearing scheduled for September 16, 2022 for an additional 60 days so that Southern can continue to repair issues that were caused by the historic flooding and process FEMA documentation without interruption in these activities due to preparing for and attending the September 16 hearing.

Respectfully Submitted Electronically on September 6, 2022,

/s/ Steven Bailey  
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