

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**ELECTRONIC PURCHASED WATER )  
ADJUSTMENT FILING OF ) CASE NO. 2022-00241  
MUHLENBERG COUNTY WATER )  
DISTRICT )**

**MOTION FOR EXTENSION OF TIME**

Muhlenberg County Water District (“Muhlenberg District”), by counsel, moves the Public Service Commission (the “Commission”) for a **two (2) month** extension of time, until October 31, 2023, in which to file Muhlenberg District’s Alternative Rate Filing (the “ARF”) Application for a rate increase.

In support of this Motion, Muhlenberg District states as follows:

**Background**

1. On August 30, 2022, the Commission in this matter granted Muhlenberg District’s application for a Purchased Water Adjustment (“PWA”), but ordered Muhlenberg District to file an ARF Application for a rate adjustment on or before August 31, 2023.

2. Muhlenberg District immediately contacted the Kentucky Rural Water Association, Inc. (“KRWA”) and requested a proposal for performing a Rate Study and assistance with preparing and filing the required ARF Application for a rate

adjustment. On September 6, 2022, Muhlenberg District followed-up this initial request with a formal request to KRWA.

3. Because of a backlog of cases, KRWA informed Muhlenberg District that it could not commence working on the Rate Study until approximately sixty (60) days following the filing of Muhlenberg District’s Annual Report. Nevertheless, KRWA stated that it planned to meet the August 31, 2023 deadline. Earlier this week, KRWA informed Muhlenberg District that it would be unable to meet this deadline.

**Timeline of Events and Intended Next Steps**

4. In the interest of efficiency, the chart below sets forth a timeline summarizing important background events regarding the ARF Application and Muhlenberg District and KRWA’s intended next steps to ensure the ARF Application is filed before October 31, 2023.

08-30-22	PSC approves PWA and orders MCWD to file a rate application by 08-31-23
09-06-22	MCWD requests KRWA to prepare the Proposal for Rate Study and ARF Application
11-04-22	KRWA sends the Proposal to MCWD
11-28-22	MCWD Board approves the Proposal, signs the Proposal, and sends the accepted Proposal to KRWA
03-31-23	MCWD timely files its PSC Annual Report

08-22-23	KRWA informs MCWD that it cannot meet the Commission's 08-31-23 deadline
09-15-23	KRWA plans to send a draft of the Rate Study to MCWD for review
09-25-23	KRWA meets with Board to review the draft Rate Study
09-25-23	MCWD Board approves the Rate Study and adopts a Resolution authorizing filing of ARF Application
10-18-23	Customer Notice published in newspaper
10-24-23	ARF Application filed with PSC

5. As of the date of this Motion, KRWA states that the Rate Study is approximately sixty percent (60%) to seventy-five percent (75%) complete.

6. From now until September 15, 2023, KRWA plans to complete and confirm the accuracy of the Rate Study, including the Schedule of Adjusted Operations, Billing Analysis, Schedule of Current and Proposed Rates, and other necessary schedules.

7. Between September 25, 2023 and October 18, 2023, KRWA will make any and all necessary revisions or corrections to the Rate Study following the Muhlenberg District Board meeting and will finalize the ARF Application. This includes preparation of the numerous exhibits and attachments that will accompany the ARF Application.

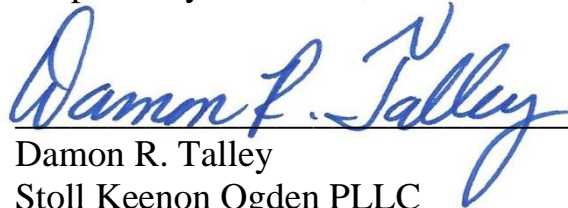
8. KRWA has assured Muhlenberg District that the Timeline shown above is very reasonable, and that it fully intends to meet the milestone events and deadlines contained in the Timeline chart. KRWA is confident that it will timely perform its obligations which will enable Muhlenberg District to file the ARF Application before October 31, 2023.

9. This request is made in good faith, not for purposes of delay, and will not unduly prejudice the Commission.

**WHEREFORE**, Muhlenberg District requests that the Commission's Order of August 30, 2022 be amended to grant Muhlenberg District an extension of time until October 31, 2023 in which to file the ARF Application for a rate increase.

Dated: August 28, 2023

Respectfully submitted,

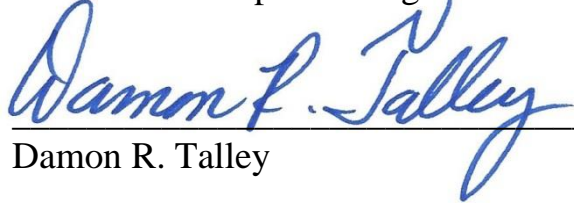


Damon R. Talley  
Stoll Keenon Ogden PLLC  
P.O. Box 150  
Hodgenville, KY 42748-0150  
Telephone: (270) 358-3187  
Fax: (270) 358-9560  
damon.talley@skofirm.com

Felisa S. Moore  
Stoll Keenon Ogden PLLC  
300 West Vine Street, Suite 2100  
Lexington, Kentucky 40507-1801  
Telephone: (859) 231-3039  
Fax: (859) 253-1093  
felisa.moore@skofirm.com  
*Counsel for Muhlenberg County Water District*

## CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on August 28, 2023, and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

  
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Damon R. Talley

# EXHIBIT 1



## Proposed Rate Study Muhlenberg County Water District

Prepared by: Kentucky Rural Water Association  
November 2022

Kentucky Rural Water Association (KRWA) will perform a water rate study for Muhlenberg County Water District using methodologies acceptable to Kentucky Public Service Commission (KY PSC) upon approval of this proposal.

### Scope of Work

This work will include completing the following items:

- ✓ Preparation of Schedule of Adjusted Operations, Revenue Requirement Calculations, Proposed Rate Schedules, and Billing Analyses.
- ✓ Preparation of a written summary report.
- ✓ Attendance at one meeting with Board of Commissioners for presentation of report.
- ✓ Submission of Alternative Rate Filing Application to KY PSC.
- ✓ Coordination and submission of responses to KY PSC Staff Requests for Information.
- ✓ Preparation of response to KY PSC Staff Report.
- ✓ Preparation of updated Tariff sheets.

This proposal does not include attendance at public hearings and other meetings.

### Qualifications

The rate study will be performed by an experienced contractor selected by KRWA.

### Estimated Start and Completion Times

The rate study will begin within approximately 90 days of approval of this proposal. Completion time is determined by KY PSC but is typically within 270 days of approval of this proposal.

### Proposed Cost

#### Cost of Service Study:

Estimated research, analysis, and PSC filings	\$6,000
Kentucky Rural Water Association administrative services	<u>\$1,500</u>
<b>Total</b>	<b>\$7,500</b>

Accepted by: Bory Nye

Date: 11-28-22