

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC MOUNTAIN WATER)	
DISTRICT UNACCOUNTED-FOR)	
WATER LOSS REDUCTION PLAN,)	CASE NO. 2023-00351
SURCHARGE AND MONITORING)	

MOTION FOR EXTENSION OF TIME

Mountain Water District (“the District”) moves the Kentucky Public Service Commission (“Commission”) for an extension of the time until April 11, 2025 in which to respond to Commission Staff’s Second Request for Information.

In support of its Motion, the District states:

1. On December 2, 2024, the District moved to substitute a revised version of its Qualified Infrastructure Improvement Plan (“QIIP”) for the original version, which the District had filed on February 28, 2024 with the Commission. It further requested that the Commission authorize the expenditure of water loss surcharge funds for QIIP Year 2 set forth in the revised QIIP (2025).

2. On February 21, 2025, the Commission accepted the revised QIIP and authorized the use of water loss surcharge funds for most expenditures proposed for QIIP Year 2, but deferred ruling on the request for authorization to purchase leak detection equipment at an estimated cost of \$100,676 pending the submission of addition information. Appended to the Commission’s Order of February 21, 2025 was Commission Staff’s Second Request for Information, which sought addition information regarding the proposed expenditure for leak detection equipment. Pursuant to the terms of this request, the District is to provide the requested information no later than March 14, 2025.

3. The District is unable to provide the requested information within the allotted time. In mid-February of this year, portions of Eastern Kentucky, including Pike County, experienced heavy flooding, causing millions of dollars of property damage and dislocating thousands of persons. This flooding severely affected Mountain District's distribution facilities. At one point, over 10,000 District customers were without water service. Several river and creek crossings were either destroyed or disrupted and numerous service lines and meters were broken or washed away. Water service was not completely restored to all District customers until March 4, 2025.

4. Those District officials responsible for the QIIP's development and implementation and for preparing the response to the Commission Staff's request for information are currently focused on service restoration and damage assessment and the District's efforts to obtain from state and federal relief officials the necessary aid to permanently repair the District's water and sewer systems.

5. The District respectfully requests that the Commission extend by 28 days the District's time to submit a response to Commission Staff's Second Request for Information. This extension will allow the District's officials adequate time to respond without forcing them to divert their attention from addressing the immediate and significant needs the flooding created.

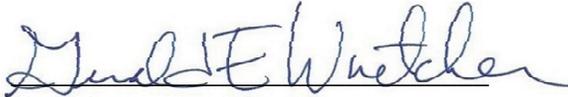
6. The extension of time will not adversely affect or impose any hardship upon the Commission or Commission Staff. This proceeding has no statutory deadlines. The extension will reduce the time in which the Commission has to review the District's responses or render a decision. The delay will not affect the assessment of the surcharge or allow the District to expend any surcharge funds that the Commission has not already authorized.

7. The District makes this motion in good faith and not for purposes of delay.

Wherefore, Mountain Water District requests that the Commission extend the time for submitting a response to Commission Staff's Second Request for Information to April 11, 2025.

Dated: March 5, 2025

Respectfully submitted,



Gerald E. Wuetcher
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100,
Lexington, Kentucky 40507-1801
Telephone: (859) 231-3017
Fax: (859) 259-3597
gerald.wuetcher@skofirm.com

Counsel for Mountain Water District

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) and 807 KAR 5:001, Section 8, I certify that this electronic filing has been transmitted to the Commission on March 5, 2025; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



Counsel for Mountain Water District