

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 LEAVE TO FILE RESPONSE OUT OF TIME

Mountain Water District (“the District”) moves the Kentucky Public Service Commission (“Commission”) for leave to file a response to the Commission’s Order of February 21, 2025 out of time.

In support of its Motion, the District states:

1. On February 21, 2025, the Commission authorized the District to use water loss surcharge funds to pay the wages and benefits of a new two-employee leak detection crew. In the same Order containing this authorization, the Commission directed the District to submit “documentation as to the salary and benefits for each employee within 30 days of the initial hiring date and then subsequently thereafter by Jan. 30th of each year.”

2. The District failed to submit the required documentation by January 30, 2026. This failure was neither deliberate nor intentional. In its effort to meet other pressing commitments, primarily the need to respond to requests for information in its current rate proceeding, District personnel lost track of the filing deadline. The failure to meet the January 30, 2026 filing deadline was only recently recognized.

3. The District has put into place a process to ensure that the requirement will be timely met in the future. The District’s general manager is now personally tracking the requirement to ensure compliance.

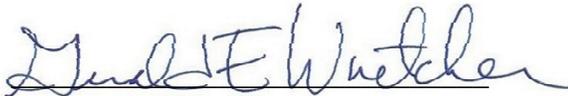
4. The late submission will not adversely affect the Commission's ability to monitor the District's expenditure of surcharge proceeds. The District has submitted detailed documentation regarding employee salaries and benefits in its monthly surcharge reports to verify surcharge expenditures related to employee salary and benefits.

5. The District apologizes for its failure to timely submit the required information.

Wherefore, Mountain Water District requests that the Commission accept its response to the Commission's Order of February 21, 2025.

Dated: March 6, 2026

Respectfully submitted,

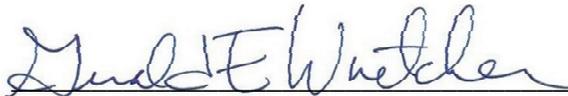


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Counsel for Mountain Water District

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 6, 2026; 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