

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**ELECTRONIC APPLICATION OF )  
MOUNTAIN WATER DISTRICT FOR A ) CASE NO. 2022-00366  
GENERAL ADJUSTMENT OF WATER )  
RATES )**

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

**MOTION TO MODIFY THE DAY FOR SUBMISSION OF  
MONTHLY REPORTS AND TO CLARIFY THE TIME PERIOD FOR  
THE ASSESSMENT OF SURCHARGE AND THE DATE FOR SUBMISSION  
OF THE FIRST ANNUAL REPORT**

Pursuant to 807 KAR 5:001, Section 5(1), Mountain Water District (“Mountain District” or “the District”) moves the Public Service Commission (“Commission”) to modify the day on which the District must submit its monthly surcharge and water loss reports to the last day of each month and to clarify that the 48-month period in which the District may assess a Water Loss Reduction Surcharge runs from January 2024 to December 2028 and that the first annual report of surcharge activity and water loss improvement progress must be submitted no later than April 30, 2025.

In support of its Motion, the District states:

1. On October 31, 2023, the Commission issued an Order in Case No. 2022-00366 in which it authorized the District to assess a Water Loss Reduction Surcharge over 48 months. On the same day, the Commission established Case No. 2023-00351 to monitor the collection and use of Water Loss Reduction Surcharge proceeds.

2. In its Orders of October 31, 2023 in both proceedings, the Commission directed the District to file a surcharge activity report and a water loss report for the prior month on the fifteenth day of each month. It further directed the District to file no later than April 30 of each year “report of surcharge activity and water loss improvement progress based on the preceding year ended December 31.”

3. Mountain District obtains the information necessary to prepare an accurate and thorough water loss report from several sources, including the billing invoices of the District’s wholesale water suppliers, fire department reports of water usage, and consumption reports from the District’s ten billing cycles. The information from these sources for the prior month is generally not available by the fifteenth day of the month. Therefore, the District requests that it be permitted to file the water loss and surcharge activity reports on the last day of the following month. (For example, the reports for March 2024 would be filed no later than April 30, 2024.) The proposed modification to the filing schedule would permit the District to submit all required reports in a single filing and ensure the submitted information is complete. Establishing a single filing date later in the month would also lessen Commission Staff’s burden to monitor reporting compliance.

4. Shortly after the issuance of the Orders of October 31, 2023, the District implemented a new billing system. As a result of this implementation, the District could not begin billing the surcharge until January 2024. Because billing and collection of the Water Loss Reduction Surcharge could not begin until January 2024, the District requests that the Commission clarify that the District is authorized to bill that surcharge for the 48-month period beginning January 2024 and ending December 2028, or when \$1,365,608 is collected, whichever occurs first.

5. Because collection of the Water Loss Reduction Surcharge did not begin until January 2024 and no surcharge was collected in 2023, the District further requests that the

Commission clarify that first annual report of surcharge activity and water loss improvement progress may be submitted no later than **April 30, 2025**.

WHEREFORE, Mountain Water District requests that the Commission amend its Orders of October 31, 2024 in the above-styled matters to permit the District to file its monthly water loss and surcharge activity reports on the last day of the following month; to clarify that the District is authorized to bill the Water Loss Reduction Surcharge for the 48-month period beginning January 2024 and ending December 2028, or when \$1,365,608 is collected, whichever occurs first ; and to further clarify that the District shall submit its first annual report of surcharge activity and water loss improvement progress no later than **April 30, 2025**

Dated: March 11, 2024

Respectfully submitted,

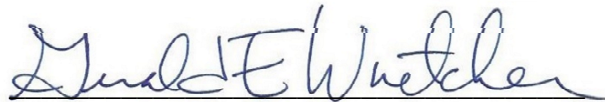


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### **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8 and the Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was transmitted to the Public Service Commission on March 11, 2024 and that no parties have been excused from electronic filing procedures.



*Counsel for Mountain Water District*