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SEP 22 2014

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

CANNONSBURG WATER DISTRICT 'S)
UNACCOUNTED FOR WATER LOSS) Case No. 2014-00267
REDUCTION PLAN, SURCHARGE AND)
MONITORING

MOTION TO AMEND AND OR MODIFY

Comes now the applicant, Cannonsburg Water District by a and through counsel and hereby moves the Kentucky Public Service Commission for Order modifying and or Amending the Order that was previously entered by the Kentucky Public Service Commission pertaining to Cannonsburg Water District's Unaccounted-For Loss Reduction Plan, Surcharge and Monitoring Plan on August 7, 2014 and hereby states as follows:

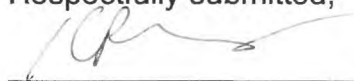
On August 8, 2011, the Public Service Commission accepted Cannonsburg Water District's, ("Cannonsburg") application for approval of emergency rate relief to adjust its rates for water service for the purpose of addressing non-revenue water reduction efforts. Subsequently, the Public Service Commission entered and Order On August 7, 2014 addressing Cannonsburg's Unaccounted-For Loss Reduction Plan, Surcharge and Monitoring Plan. While the Order the addressed several key issues regarding the plan, it failed to grant Cannonsburg the authority to make payments of its costs associated with the implementation of its Unaccounted-For Loss Reduction Plan, Surcharge and Monitoring.

Specifically, the Order failed to mention and authorize Cannonsburg to pay the engineering costs in the total amount of \$12,632.00 Invoices attached hereto and marked as Exhibits "A".

Engineering services play a necessary and vital role to the implementation of Cannonsburg's non-revenue water reduction efforts. Success in the plan can only be achieved by the engagement of such engineering professional services. The costs of the engineering services submitted are fair and reasonable.

WHEREFORE, the applicant Cannonsburg Water District, formally requests an Order Amending and or Modifying the Order entered August 7, 2014 authorizing Cannonsburg Water District to pay certain engineering costs associated with the Unaccounted - For Water Loss Reduction Plan, Surcharge and Monitoring and further requests the authorization of payment of legal fees in the amount of \$800.00 for having brought this motion.

Respectfully submitted,

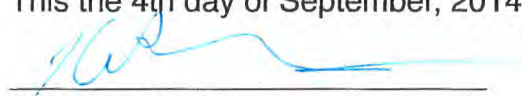


Kevin P. Sinnette
2706 Louisa Street
P.O. Box 532
Catlettsburg, KY 41129
Tel. (606) 739-6774
Fax (606) 739-9125

A copy of the foregoing Motion was sent, postage prepaid to:

Kentucky Public Service Commission
P.O. Box 615
Frankfort, KY 40602

This the 4th day of September, 2014.



Kevin P. Sinnette



**E.L. ROBINSON
ENGINEERING**

file

T: 606.326.1890
F: 606.326.1890

3145 Greenup Avenue
Ashland, KY 41101



May 9, 2014

Cannonsburg Water District
Attn: Danny Clarkston- General Manager
1606 Cannonsburg Road
Ashland, KY 41102

Re: KY Public Service Commission Surcharge Project- Monitor and Bypass Meters
Water Loss Prevention and Leak Detection Program
Robinson Project Number: 1714021 ELR Invoice Number: 001
Periodic Invoice #1

Dear Mr. Clarkston:

The following is our Invoice for professional services for the associated project. Attended meeting in KY PSC Offices in Frankfort, complete final plans/specs, bidding assistance with installation of Monitor and Bypass Meters. Period from March 1, 2014 thru May 4, 2014.

Total Project Fee	Hourly Rates		
	Manhours Charged	Rate/Hour	Sub-Total
<i>KY PSC- Water Loss Prevention and Leak Detection Program</i>			
<i>Professional Engineer</i>	15.00	\$145.00	\$ 2,175.00
<i>Engineering CADD Technician</i>	47.25	\$70.00	\$ 3,308.00
Total Fee Due to Date			\$ 5,483.00
Less Previous Invoices			\$ -
Amount Due This Invoice			\$ 5,483.00

Please make checks payable to and remit payment to the following address:

**E.L. Robinson Engineering Company
3145 Greenup Avenue
Ashland, KY 41101**

For accounting purposes, E.L. Robinson Tax Identification 31-1725058. We appreciate the opportunity to serve you and being your choice in all of your engineering and consulting needs.

Respectfully submitted,

Paul Amburgey , PE
Director of Engineering – KY

“ Exhibit A ”

cc: Kim Meadows, E.L. Robinson



**E.L. ROBINSON
ENGINEERING**

SW

T: 606.326.1890
F: 606.326.1890

3145 Greenup Avenue
Ashland, KY 41101



June 10, 2014

Cannonsburg Water District
Attn: Danny Clarkston- General Manager
1606 Cannonsburg Road
Ashland, KY 41102

Re: KY Public Service Commission Surcharge Project- Monitor and Bypass Meters
Water Loss Prevention and Leak Detection Program
Robinson Project Number: 1714021 ELR Invoice Number: 002
Periodic Invoice #2

Dear Mr. Clarkston:

The following is our Invoice for professional services for the associated project. Attended meeting in KY PSC Offices in Frankfort, complete final plans/specs, coordination w/KY PSC, bidding assistance with installation of Monitor and Bypass Meters. Period from May 5, 2014 thru June 1, 2014.

Total Project Fee	Hourly Rates		
	Total Manhours Charged	Rate/Hour	Sub-Total
<i>KY PSC- Water Loss Prevention and Leak Detection Program</i>			
<i>Professional Engineer</i>	23.75	\$145.00	\$ 3,444.00
<i>Engineering CADD Technician</i>	131.25	\$70.00	\$ 9,188.00
Total Fee Due to Date			\$ 12,632.00
Less Previous Invoices			\$ 5,483.00
Amount Due This Invoice			\$ 7,149.00

Please make checks payable to and remit payment to the following address:

E.L. Robinson Engineering Company
3145 Greenup Avenue
Ashland, KY 41101

For accounting purposes, E.L. Robinson Tax Identification 31-1725058. We appreciate the opportunity to serve you and being your choice in all of your engineering and consulting needs.

Respectfully submitted,

Paul V. Amburgey

Paul Amburgey , PE
Director of Engineering – KY

cc: Kim Meadows, E.L. Robinson
File: Cannonsburg WD Contract and Invoices File