

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

Parksville Water District

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v.

)

Case No. 2007-00405

)

City of Danville

MOTION

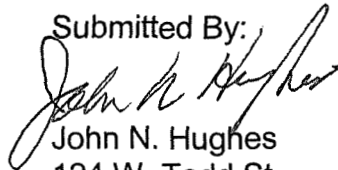
Parksville Water District, by counsel, moves for an order allowing it to withhold payment of the disputed rate to the city of Danville for wholesale water purchases pending a final decision in this matter. Based on the bill analysis attached as exhibit 3 to the Complaint, Parksville believes it has been improperly billed for water in the amount of \$20,672.78 from August, 2005, through July, 2007. That amount of excessive payments continues to grow due to Danville's continued billing of the unauthorized rate. Parksville has no means of recovering that excess payment through its Purchased Water Adjustment tariff during the Commission's review and the unwarranted payments create a financial hardship on the District.

Parksville filed its Complaint on September 18, 2007. In its Motion of November 5, 2007, the city claims it did not receive the Commission's Order to Satisfy, dated September 24, 2007. It now wants additional time to respond. Danville continues to bill the disputed rate to Parksville. To avoid the continued windfall to Danville and the financial harm to Parksville, pending the final decision in this case, Parksville seeks authority to pay for purchased water at the last approved wholesale rate, rather than the unauthorized rate currently being billed by Danville.

For these reasons and to avoid further excessive payments to the city and financial harm to Parksville, the Commission should allow Parksville to pay the last approved

purchased water rate for all water purchased after the filing of the Complaint pending the outcome of this proceeding.

Submitted By:

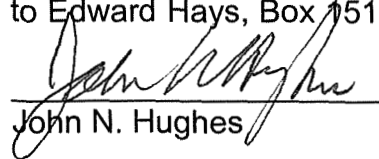


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Certificate:

I certify that a copy of this motion was mailed to Edward Hays, Box 1517, Danville, KY 40423-1517, the 7th day of November, 2007.


John N. Hughes