

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

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PUBLIC SERVICE
COMMISSION

In the Matter of:

Proposed Adjustment of the Wholesale)
Water Service Rates of) Case No. 2014-00392
the City of Danville)

**MOTION TO CANCEL HEARING AND SUBMIT ON THE RECORD
OR, ALTERNATIVELY, TO CHANGE THE HEARING DATE**

The City of Danville (the "City" or "Danville"), by counsel, respectfully moves the Public Service Commission of Kentucky to cancel the hearing that is scheduled for June 9, 2015, and to submit this matter for a decision based on the record. Alternatively, the City requests that the Commission reschedule the hearing to another date. In support of its motion, the City states as follows:

1. On October 17, 2014, Danville filed with the Commission revised tariff sheets setting forth proposed adjustments to its existing rates for wholesale water service to Garrard County Water Association, Inc. ("GCWA), Lake Village Water Association, Inc. ("LVWA"), and Parksville Water District ("PWD") effective on and after November 19, 2014.

2. By order dated November, 14, 2014, the Commission established this case, suspended the proposed rates through April 18, 2015, and made GCWA and PWD parties to the case.

3. By order dated December 31, 2014, the Commission entered an amended procedural schedule that afforded the opportunity for written discovery, testimony by GCWA and PWD, and rebuttal testimony.

4. Only the Commission and Commission Staff sought written discovery from the City; GCWA and PWD did not make any requests for information from the City.

5. By order dated February 19, 2015, the Commission scheduled an evidentiary hearing for June 9, 2015.

6. All requests for information have been answered, and the record is sufficiently complete. In response to various requests for information, Danville has provided information indicating that it could justify rates higher than what are being proposed as fair, just, and reasonable. As such, Danville believes there is sufficient evidence in the record to grant the proposed rate increase without the necessity of a hearing before the Commission.

7. LVWA has not intervened in this matter and has not filed any challenge to the City's proposed rates. GCWA has recently stated that it would no longer object to the City's proposed rates as long as those rates were not implemented until May 2015.

8. Danville has notified the Commission and its wholesale customers that it would implement on May 1, 2015, its proposed rates (excluding rate case expense) subject to refund based on the Commission's decision.

9. Alternatively, if the Commission determines that a hearing is necessary, the City requests that the Commission reschedule the hearing date. One of the City's primary witnesses, Connie Allen of Salt River Engineering, is a U.S. Air Force reservist and is scheduled to be on temporary duty on June 9, 2015. As such, the City requests that the Commission reschedule the hearing to ensure the City's ability to present its case and respond to cross examination.

WHEREFORE, Danville respectfully requests the Commission:

(1) Cancel the hearing scheduled for June 9, 2015, and take this matter under submission for a decision;

(2) Approve the following proposed rates:¹

PWD \$2.68/1,000 gal. + rate case expense + KRA withdrawal fee

GCWA \$2.41/1,000 gal. + rate case expense + KRA withdrawal fee

LVWA \$2.41/1,000 gal. + rate case expense + KRA withdrawal fee;

(3) Alternatively, reschedule the hearing date.

Respectfully submitted,



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ATTORNEYS FOR THE CITY OF DANVILLE

¹ Rate case expenses are identified in the City's Supplemental Response, which was contemporaneously filed with this motion.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via U.S. Mail, postage prepaid, to the following on April 23, 2014:

Caywood Metcalf
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Mr. T. W. Jones

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