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August 22, 2005

VIA FACSIMILE AND REGULAR U.S. MAIL

Beth O'Donnell
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Thomas Nienabor
The Horwitz Law Firm, PSC
541 Buttermilk Pike, Suite 305
Crescent Springs, Kentucky 41017

**Re: Case No. 2005-00297
Proposed Adjustment of the Wholesale Water Service Rates of the City of
Williamstown, Kentucky**

Dear Ms. O'Donnell, Mr. Wichner and Mr. Nienabor:

Enclosed please find a Motion regarding the above referenced case. Should you have any questions or concerns regarding this matter, please do not hesitate to contact me.

Beth O'Donnell
Jerry Wichner
Thomas Nienabor
August 22, 2005
Page 2

Sincerely,

KOHNEN & PATTON LLP

Jeffrey C. Shipp

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

**PROPOSED ADJUSTMENT OF THE WHOLESALE WATER SERVICE RATES
OF THE CITY OF WILLIAMSTOWN, KENTUCKY**

CASE NO. 2005-00297

MOTION

On July 26, 2005, the Kentucky Public Service Commission entered an Order suspending the City of Williamstown's proposed rate revision for wholesale water sales to the Bullock Pen Water District ("Bullock District") for five months, up to and including January 31, 2005. The City of Williamstown's proposed rate revision was approved by the Commission on July 12, 2005. However, the Commission has stated that this permission was given in error and without adequate consideration of the Bullock District's request for an investigation. Accordingly, the Commission, by Order dated July 26, 2005, suspended the City of Williamstown's proposed rate revision.

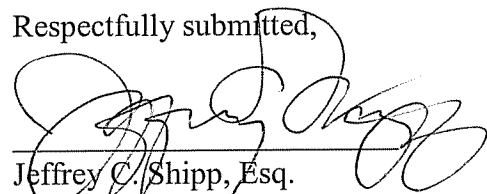
Along with its suspension of the rate revision, the Commission asked for a multitude of information from the City of Williamstown in its July 26, 2005 Order. The Order contains a list of twenty-nine (29) types of information requested from the City of Williamstown. The Commission states in its Order that the City Williamstown shall file its response to the Commission's request for information no later than August 26, 2005. However, pursuant to the Order, the public hearing on this matter shall not occur until December 6, 2005.

As the Commission previously approved the proposed rate revision, the Commission's suspension was unexpected by the City of Williamstown. The Commission now requests voluminous amounts of information from the City of Williamstown by its Order. Also, the

attorney for the City of Williamstown will need additional time than allowed by the Order to review the information before it is submitted to the Commission. For these reasons, and the fact that the Commission's request for information was recently served on the City of Williamstown, the City of Williamstown hereby moves the Commission for an extension of seventy-five (75) days, until November 9, 2005, in which to provide its response to the Commission's request for information.

Also, the Commission has requested from the City of Williamstown the independent auditor's reports for Williamstown's water operations and sewer operations for the fiscal years ending June 30 2002, June 30, 2003 and June 30, 2004. However, the Commission does not request the independent auditor's report for the fiscal year ending June 30, 2005. As this report contains information about costs for the most recent year, which is most relevant pursuant to 807 KAR 5:068¹, the independent auditor's report for the fiscal year ending June 30, 2005 should be reviewed by the Commission with the other auditor's reports requested by the Commission. Accordingly, the City of Williamstown moves the commission to request, accept and review the independent auditor's report for the fiscal year ending June 30, 2005.

Respectfully submitted,



Jeffrey C. Shipp, Esq.
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¹ 807 KAR 5:068 §2(2) states "[i]n the event there is an increase in the supplier's base rate, the water district or water association shall determine the increased cost of water purchased on the twelve (12) months period ending within ninety (90) days immediately prior to the effective date of its rate adjustment to its customers."

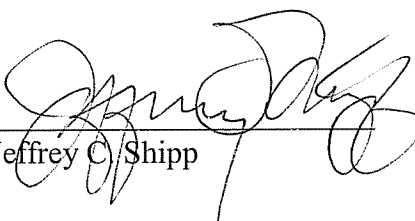
Certificate of Service

I hereby certify that copies of the foregoing has been sent by regular U.S. Mail this 22nd day of August 2005 to:

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