

L. Allyson Honaker allyson@gosssamfordlaw.com (859) 368-7740

July 28, 2017

RECEIVED

JUL 28 2017

PUBLIC SERVICE COMMISSION

Via Hand-Delivery

Mr. John S. Lyons Acting Executive Director Kentucky Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, KY 40602

Re:

In the Matter of: *The Application of Citipower, LLC for a Rate Adjustment for Small Utilities Pursuant to 807 KAR 5:076* - Case No. 2017-00160

Dear Mr. Lyons:

Enclosed please find for filing with the Commission in the above-referenced case an original and ten (10) copies of Citipower LLC's Motion to Submit for Decision on the Existing Record and Updated Rate Case Expense. Please return a file-stamped copy to me.

Please do not hesitate to contact me if you have any questions.

Sincerely,

L. Allyson Honaker

Jon Honoher

Enclosures

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

JUL 28 2017

PUBLIC SERVICE COMMISSION

In the Matter of:

The Application of Citipower, LLC for a)		
Rate Adjustment for Small Utilities)	Case No. 2017-00160	
Pursuant to 807 KAR 5:076)		

MOTION TO SUBMIT FOR A DECISION ON THE EXISTING RECORD AND UPDATED RATE CASE EXPENSES

Comes now Citipower, LLC ("Citipower"), by counsel, and moves the Kentucky Public Service Commission ("Commission") to submit the case for a decision on the merits based upon the existing record and updates the rate case expenses incurred by Citipower, LLC in this case. In support of this Motion, Citipower respectfully states that there are no remaining procedural deadlines from the Commission's May 10, 2017 Scheduling Order and there are no intervenors in the case. Accordingly, the administrative record appears to be complete and the case may be submitted to the Commission for a final decision on the merits based upon the existing administrative record. Citipower hereby waives its right to a hearing so that a decision may be given at the Commission's earliest opportunity.

The rate case expenses incurred by Citipower, as of the date of this filing are as follows:

Legal fees:	\$18,655.50
Costs (mileage, copies, CDs, etc.):	\$ 1,473.41
Publication costs (office supplies, extra postage, etc.)	\$ 619.62
Total:	\$20,748.53

WHEREFORE, Citipower respectfully requests that the Commission take the case under submission and issue a final Order regarding same based upon the existing administrative record, and to update the rate case expense to be amortized over a three year period.

This 28th day of July, 2017.

Respectfully submitted,

David S. Samford L. Allyson Honaker

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Counsel for Citipower, LLC

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:	
THE APPLICATION OF CITIPOWER, LL	,
FOR A RATE ADJUSTMENT FOR SMAL	
UTILITIES PURSUANT TO 807 KAR 5:07	(6 `)
· VERIFICATION OF A	DAM FORSBERG
<i>e</i> .	
STATE OF NORTH CAROLINA)	
、)	
COUNTY OF GUILFORD)	
Adam Forsberg, Chief Financial Officer for G	Citienergy, LLC, being duly sworn, states that
the rate case expenses, for the above-styled case, co	ntained in the foregoing are true and accurate
to the best of his knowledge, information and belief,	formed after reasonable inquiry.
	Adam Forsberg
Subscribed and sworn to before me on this 2	7 th day of July, 2017.
WITAAL NOTAAL	Sally M. Cellan STARY PUBLIC, Notary #_ Comprission expiration: Dec 23, 2017