

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Joint Application of Corix Utilities (Illinois)
LLC; Hydro Star, LLC; Utilities, Inc.;) Case No. 2012-00133
and Water Service Corporation of Kentucky)
for the Transfer and Acquisition)
of Control Pursuant to KRS 278.020)

MOTION FOR WAIVER

Water Service Corporation of Kentucky (“WSCK”), by counsel, respectfully moves this Commission for an order granting a waiver from a previously ordered condition or, alternatively, a modification and extension to that condition.

On August 13, 2012, the Commission approved WSCK’s application for transfer of control subject to a variety of conditions agreed upon by WSCK. One of those conditions was that the Company “will host annual public meetings in Clinton and Middlesboro to provide a forum for customers to communicate with utility management.” For several months, WSCK has evaluated the opportunity to conduct public meetings in both localities while considering public and employee safety given the Covid-19 state of emergency. That opportunity has not presented itself during the pandemic.

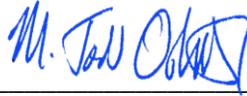
In the interests of safety for the public and its employees, WSCK believes that it would be imprudent to schedule a local public meeting in Clinton and Middlesboro. This is still true today, particularly in light of the public meeting restrictions established in Kentucky. WSCK

also considered hosting a virtual public meeting, but did not believe this to be an inclusive platform for its customer demographic, nor did it appear to be the optimal platform to effectively moderate customer questions and comments.

Despite not holding public meetings in 2020, there have been opportunities for local officials and the public to provide feedback to utility management. Notably, utility management attended a meeting with the City Council of Clinton in 2020. In addition, State Operations Manager Stephen Vaughn remains in contact with local officials in Middlesboro and Clinton throughout the year. And dozens of customers provided public comment in the context of WSCK's recent rate cases. WSCK acknowledges that these interactions are not the same as a local public meeting, but it believes that they mitigate some of the effects of not having a local public meeting as a result of Covid-19.

Accordingly, WSCK respectfully requests a waiver from the requirement that it hold a public meeting in in Middlesboro and Clinton in 2020. If granted the waiver, the Company will monitor the status of the pandemic next year and schedule public meetings in each locality in 2021 at a reasonable time. Alternatively, if the Commission believes that meetings should be held, WSCK respectfully requests a reasonable extension to permit a virtual meeting to be scheduled with 60 days of the issuance of an order indicating such.

Respectfully submitted,



STURGILL, TURNER, BARKER & MOLONEY, PLLC
James W. Gardner
M. Todd Osterloh
333 W. Vine Street, Suite 1500
Lexington, Kentucky 40507
Telephone No.: (859) 255-8581
Facsimile No.: (859) 231-0851
jgardner@sturgillturner.com
tosterloh@sturgillturner.com

Attorneys for WSCK

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the December 14, 2020, electronic filing of this document is a true and accurate copy of the same document being filed in paper medium. Pursuant to Case No. 2020-00085, a paper copy will be delivered to the Commission within 30 days after the state of emergency is lifted. Electronic copies of this filing will be served on the Attorney General's Office to the following: Horne, John G (KYOAG) <John.Horne@ky.gov>; West, Michael (KYOAG) <Michael.West@ky.gov> ; and Goad, Angela M (KYOAG) <Angela.Goad@ky.gov>.



Counsel for WSCK