## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Application of Water Service Corporation of Kentucky for a General Adjustment in Existing Rates

Case No. 2013-00237

## MOTION

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Water Service Corporation of Kentucky ("WSCK"), by counsel, hereby moves the Commission to permit Helen Lupton to testify—if requested to appear by the parties or the Commission—by telephone or video conference at the hearing scheduled for April 9, 2014. Ms. Lupton is a Regional Vice President of Utilities, Inc., and is based out of the Charlotte, North Carolina, office. In this matter, she has presented direct and rebuttal testimony and sponsored responses to requests for information on the issue of expenses allocated to WSCK.

Ms. Lupton gave birth to a son on February 26, 2014, and he will be six-weeks old on the date of the hearing. It is not recommended for infants of such a young age to travel long distances. For this reason, WSCK requests that Ms. Lupton be permitted to participate in the hearing remotely.

WSCK also notes the narrow, albeit significant, nature of Ms. Lupton's testimony. Although the parties and Commission Staff have not yet discussed which witnesses will be requested to appear at the hearing for cross-examination, WSCK anticipates that any questioning of Ms. Lupton will be relatively short, as compared with other WSCK witnesses, due to the narrow focus of her pre-filed testimony.

The Commission has permitted witnesses to testify via telephone in previous cases. In <u>Blair v. Appalachian Waste Control</u>, Case No. 2007-00502, the Commission permitted witness David Ellis to testify telephonically. In addition, the Commission accepted telephonic testimony in rate cases for Kentucky Utilities and Louisville Gas & Electric in Case Nos. 2003-00433 and 2003-00434.

Accordingly, WSCK respectfully requests the Commission allow Ms. Lupton to testify via telephonic or video conferencing means at the hearing scheduled for April 9, 2014. If approved, WSCK will discuss the logistics such testimony with the parties and Commission Staff at the informal conference scheduled for April 1, 2014.

Respectfully submitted,

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ATTORNEYS FOR WATER SERVICE CORPORATION OF KENTUCKY