

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. 2015-00382

JOINT MOTION

Water Service Corporation of Kentucky (“WSCK”) and Office of the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), by counsel, hereby move the Commission to withdraw from consideration the Stipulation, Partial Settlement, and Recommendation at the hearing and continue the evidentiary portion of the hearing in this matter set for April 19, 2016. In support of this motion, WSCK and the Attorney General state as follows:

1. On April 4, 2016, the parties in this matter entered into a Stipulation, Partial Settlement, and Recommendation that has been filed into the record of this case.
2. At an informal conference held on April 12, 2016, Commission Staff encouraged the parties to negotiate a “global” or comprehensive settlement that would include a specific revenue requirement that the parties deemed to be reasonable.
3. On April 15, 2016, the parties reached an agreement-in-principle for a global settlement. WSCK and the Attorney General have agreed to the key terms of the agreement. The Clinton City Council will consider the agreement at their next regular meeting on May 2, 2016.

4. After execution by the parties, the global settlement will supersede the Stipulation, Partial Settlement, and Recommendation that has been filed in the record of this case.

5. As the global settlement is comprehensive in nature, it may be prejudicial to the global settlement to take evidence other than public comments at the hearing on April 19, 2016, particularly regarding the portion of WSCK's application that was not addressed in the partial settlement.

6. In light of the likelihood of execution of a global settlement, it would be economically and administratively inefficient for the parties to produce and Commission Staff to question witnesses at a hearing on April 19, 2016, based on the current record of the case. As such, it is appropriate for the Commission not to consider the Stipulation, Partial Settlement, and Recommendation at this time pending execution of the anticipated global settlement and for the Commission to continue the April 19, 2016, hearing for the purposes of receiving evidence from the parties. WSCK and the Attorney General requests that the parties' witnesses be excused from participation at the April 19, 2016, hearing.¹

7. The parties, through counsel, have communicated with Commission Staff on April 15 and 18, 2016. Based on these communications, counsel will attend the April 19, 2016, hearing that will be convened for the purposes of public comment.


¹ Counsel for Commission Staff notified the undersigned counsel that this would be acceptable to the Commission based on the present circumstances.

Respectfully submitted,



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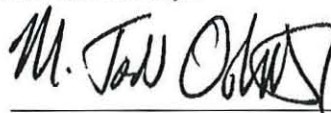
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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the April 18, 2016, electronic filing of this Motion is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on April 18, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Notice of Filing will be delivered to the Commission within two business days.



Counsel for WSCK