

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:)
)
THE APPLICATION OF KENTUCKY-AMERICAN) CASE NO. 2017-00313
WATER COMPANY FOR A QUALIFIED)
INFRASTRUCTURE PROGRAM RIDER)

RESPONSE TO ATTORNEY GENERAL’S
MOTION FOR A PROCEDURAL SCHEDULE

Kentucky-American Water Company (“KAW”) hereby responds to the Attorney General’s August 11, 2017 Motion for a Procedural Schedule in this matter. KAW does not object to a procedural schedule that allows for discovery, intervenor testimony, and a hearing should one be necessary. Indeed, KAW proposed that the new tariff take effect with service rendered on an after January 1, 2018, with the expectation that the Commission and any intervenors would need the remainder of 2017 to conduct process this case.

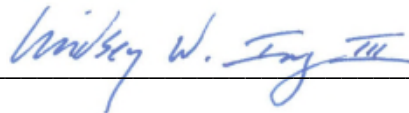
To the extent the Attorney General’s motion asks that this case be treated just like a base rate case, KAW respectfully disagrees. Without question, the Commission, intervenors, KAW, its customers, and the public interest are all well-served by a thorough consideration of KAW’s proposed tariff and KAW has no doubt that is exactly what should and will happen in this matter. KAW points out, however, that the core issue presented – whether KAW should be permitted to recover the costs associated with the needed replacement of aging infrastructure via the proposed Qualified Infrastructure Program – is simpler and narrower than the numerous and highly complicated issues presented in a full-blown general base rate case. Therefore, this case can be considered and resolved more quickly than a base rate case. Thus, KAW respectfully requests

consideration of a procedural schedule that would permit a resolution of this case by January 1, 2018.

Finally, the Attorney General's Motion begins to question the need for the Qualified Infrastructure Program, and identifies arguments the Attorney General might raise. KAW does not respond to those arguments here in its response to a Motion for Procedural Schedule, but reserves the right to do so (in addition to the arguments already made in KAW's Application and Direct Testimony) as this case proceeds.

Date: August 15, 2017

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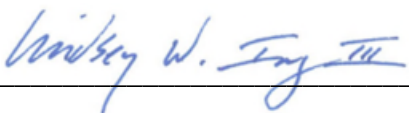
BY:  _____

Attorneys for Kentucky-American Water Company

CERTIFICATE

This certifies that Kentucky-American Water Company's electronic filing is a true and accurate copy of the documents to be filed in paper medium; that the electronic filing has been transmitted to the Commission on August 15, 2017; that paper copies of the filing will be delivered to the Commission within two business days of the electronic filing; and that no party has been excused from participation by electronic means.

STOLL KEENON OGDEN PLLC

By 

Attorneys for Kentucky-American Water Company