

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**ELECTRONIC APPLICATION OF DEXTER-     )  
ALMO HEIGHTS WATER DISTRICT FOR     ) CASE NO. 2019-00118  
AUTHORIZATION TO DEVIATE FROM 807     )  
KAR 5:006, SECTION 14(1)(b)1            )**

**MOTION TO SUSPEND ENFORCEMENT**

Dexter-Almo Heights Water District (“Dexter-Almo District”) respectfully moves that the Public Service Commission suspend any enforcement of 807 KAR 5:006, Section 14(1)(b)1 against it pending a final decision upon its Application.

In support of its Motion, Dexter-Almo District states:

1. 807 KAR 5:006, Section 14(1)(a) requires a utility to post and maintain regular business hours and provide representatives available to assist its customers and to respond to inquiries from the Commission regarding customer complaints. 807 KAR 5:006, Section 14(1)(b) requires a utility to designate at least one representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the utility's office. This designated representative must be knowledgeable of 807 KAR 5:006; 807 KAR 5:001, Section 20; KRS 278.160(2); and KRS 278.225 regarding customer bills and service and authorized to negotiate and accept partial payment plans.

2. 807 KAR 5:006, Section 14(1)(b)1 requires a water utility having annual operating revenues of \$250,000 or more to make its designated representative available during the utility’s established working hours not fewer than seven hours per day, five days per week, excluding legal holidays.

3. 807 KAR 5:006, Section 14(1)(b)2 requires a water utility having annual operating revenues of less than \$250,000 to make its designated representative available during the utility's established working hours not fewer than seven hours per day, one (1) day per week.

4. Prior to the year ending December 31, 2018, Dexter-Almo District's annual operating revenues never exceeded \$250,000.

5. In the year ending December 31, 2018, Dexter-Almo District's annual operating revenues were \$275,034. As a result of this level of revenue, Dexter-Almo District must now comply with 807 KAR 5:006, Section 14(1)(b)1, which would require a designated representative available at its office seven hours per day, five days per week.

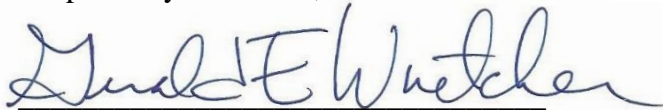
6. Dexter-Almo District has applied to the Public Service Commission for a deviation from 807 KAR 5:006, Section 14(1)(b)1 and authorization to continue to maintain regular business hours and provide representatives available to assist its customers in accordance with 807 KAR 5:006, Section 14(1)(b)2.

7. Pending a final decision on the Application, the Public Service Commission should suspend enforcement of 807 KAR 5:006, Section 14(1)(b)1 and permit Dexter-Almo Heights to continue to operate in accordance with 807 KAR 5:006, Section 14(1)(b)2. Such action will avoid any disruptions to Dexter-Almo District's operations and allow Dexter-Almo District to delay the implementation of any employment decisions that might otherwise be unnecessary if the requested relief is granted.

WHEREFORE, Dexter-Almo District respectfully moves that the Public Service Commission suspend the enforcement of 807 KAR 5:006, Section 14(1)(b)1 against it pending a final decision in this matter.

Dated: April 22, 2019

Respectfully submitted,



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*Counsel for Dexter-Almo Heights Water District,*

### **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that Dexter-Almo District's electronic filing of this Motion is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Public Service Commission on April 22, 2019; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that on or before April 24, 2019 this Motion in paper medium will be delivered to the Public Service Commission.



Gerald E. Wuetcher