### COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

### In the Matter of:

ELECTRONIC APPLICATION OF DEXTER-	)		
ALMO HEIGHTS WATER DISTRICT FOR AN	)	CASE NO.	2019-00354
ADJUSTMENT OF RATES PURSUANT TO 807	)		
KAR 5:076	)		

# **RESPONSE TO ORDER OF MARCH 31, 2020**

On March 31, 2020, the Commission issued an amended Commission Staff Report in which Commission Staff revised its recommendations regarding Dexter-Almo Heights Water District's ("Dexter-Almo District") application and proposed higher rates than originally recommended. In light of Commission Staff's revised recommendation, the Commission ordered: "If Dexter-Almo Heights District amends its Application to request the rates shown in the Appendix to the Amended Staff Report, it should mail notice of its amended rate request, pursuant to 807 KAR 5:011, Section 8, and shall provide the Commission with proof of such notice."

Dexter-Almo District respectfully declines the offer to amend its Application. As shown in the table below, the rates set forth in the Amended Staff Report are almost exactly same rates that Dexter-Almo District requested in its Application. (The only difference is that the Commission Staff-recommended rate is one cent higher in the third rate block.) Based upon Commission Staff's own calculations, the Commission Staff-recommended rates will produce only \$64 in additional annual revenues than Dexter-Almo District's proposed rates.<sup>2</sup> Dexter-Almo District respectfully submits that, given the small amount of additional revenue involve, the time and expense necessary

<sup>&</sup>lt;sup>1</sup> Order of March 31, 2020 at 3.

<sup>&</sup>lt;sup>2</sup> In its Application, Dexter-Almo District proposed rates to generate additional revenues of \$67,546 and to address an annual revenue requirement from water service rates of \$347,409. Original Staff Report at 14. In its Amended Staff Report, Staff proposed rates to produce additional annual revenues of 67,610 to address an annual revenue requirement from water service rates of \$347,471. Amended Staff Report at 4.

to amend its application and to publishing notice of the Commission Staff-recommended rates can be better devoted to enhancing the quality of the service that Dexter-Almo District provides to its customers.

Comparison of Proposed and Recommended Rates					
Proposed Rates		Commission Staff Recommended Rates			
First 2,000 Gallons	\$20.56 Minimum Bill	First 2,000 Gallons	\$20.56 Minimum Bill		
Next 3,000 Gallons	8.11 Per 1,000 Gallons	Next 3,000 Gallons	8.11 Per 1,000 Gallons		
Next 5,000 Gallons	7.17 Per 1,000 Gallons	Next 5,000 Gallons	7.18 Per 1,000 Gallons		
Next 10,000 Gallons	6.77 Per 1,000 Gallons	Next 10,000 Gallons	6.77 Per 1,000 Gallons		
Over 20,000 Gallons	5.44 Per 1,000 Gallons	Over 20,000 Gallons	5.44 Per 1,000 Gallons		

**Wherefore**, Dexter-Almo District requests that the Commission promptly issue an Order approving the proposed rates set forth in Dexter-Almo District's Application for service rendered on and after May 1, 2020.<sup>3</sup>

Dated: May 1, 2020 Respectfully submitted,

Gerald E. Wuetcher

 $gerald.wuetcher @\,skofirm.com$ 

Stoll Keenon Ogden PLLC

300 West Vine St. Suite 2100 Lexington, Kentucky 40507-1801

Telephone: (859) 231-3017

Fax: (859) 259-3517

Counsel for Dexter-Almo Heights Water District

<sup>&</sup>lt;sup>3</sup> On May 1, 2020, pursuant to KRS 278.190(2) and 807 KAR 5:076, Section 8(2), Dexter-Almo District notified the Commission of its intent to place its rates in effect immediately.

## **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that Dexter-Almo Heights Water District's electronic filing of this Response 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 May 1, 2020; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that that within 30 days following the termination of the state of emergency declared in Executive Order 2020-215, this Response in paper medium will be delivered to the Public Service Commission.

Counsel for Dexter-Almo Heights Water District