

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
EDMONSON COUNTY WATER DISTRICT)	
PURSUANT TO KRS 278.023 AND 807 KAR)	
5:069 FOR A CERTIFICATE OF PUBLIC)	
CONVENIENCE TO EXPAND ITS WATER)	CASE NO. 2019-00355
TREATMENT PLANT AND RELATED)	
WATERWORKS IMPROVEMENTS, AN)	
ADJUSTMENT OF ITS RATES FOR WATER)	
SERVICE; AND AUTHORIZATION TO ISSUE)	
CERTAIN SECURITIES)	

MOTION TO AMEND ORDER

Pursuant to KRS 278.400, Edmonson County Water District (“Edmonson District”) moves to amend the Public Service Commission’s Order of November 7, 2019 to provide that the new rates for water service will be assessed for meters read (bills issued) on and after January 1, 2020 in lieu of the stated effective date.

In support of its Motion, Edmonson District states:

1. Edmonson District reads its meters monthly using automated meter reading equipment. Meters are read over several days. While the billing period for every customer will have the same number of days, the specific days in that period may differ. (For example, all bills may cover a 30-day period. Some bills, however, will cover water usage from the tenth day of the month to the ninth day of next month, while others will cover usage from the twelfth day of the month to the eleventh day of the next month.)

2. By its Order of November 7, 2019, the Public Service Commission established new rates for Edmonson District effective for service rendered on and after November 7, 2019.

The effective date of these new rates falls within a billing cycle rather than at the start of a billing cycle. Therefore, when determining the amount of bills for service received during the first billing cycle in which the new rates are effective, Edmonson District must apply two different rate schedules to each customers' water usage.

3. The present effective date of the new rates presents problems for Edmonson District. Since customer meters were not read on November 6, 2019, Edmonson District is unable to precisely determine customer usage occurring during the portion of the billing cycle in which the prior rates were effective and that occurring in the billing cycle after the new rates became effective. Moreover, Edmonson District's software is not capable of applying two different rate schedules for the same billing period. Even if a workaround is found to permit billing the new rates for the current usage period, it will require significant and costly adjustments to Edmonson District's billing software. Additional adjustments will be required at the end of this billing period to permit the issuance of bills based solely on the new rates.

4. In lieu of adjusting its billing software, Edmonson District requests that the Public Service Commission amend its Order of November 7, 2019, to make the new rates effective for meter readings on and after January 1, 2020. This revision will permit an orderly transition to the new rates, avoid the need to adjust Edmonson District's billing software solely to account for the presence of two different rate schedules during one billing cycle (if such a solution exists), and ensure all customers are billed for water service at the new rates in the same manner. The new rates will be reflected on all bills issued in January 2020 and be assessed for all service received during that billing cycle.

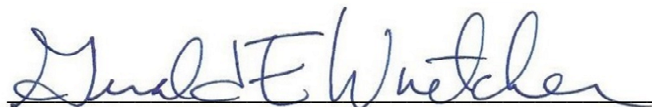
5. Placing new rates into effect based upon a utility's billing cycle is not unusual. The Commission has followed this practice for several years in proceedings in which it adjusted

fuel adjustment charges and gas cost recovery mechanisms.¹ It is a fair and equitable means of ensuring that customers are treated in an equitable manner as a utility transitions to new rates.

WHEREFORE, Edmonson County Water District requests that the Commission amend its Order of November 7, 2019 to provide that the rates set forth in Appendix A of that Order shall be effective for all meter readings occurring on and after January 1, 2020.

Dated: November 12, 2019

Respectfully submitted,




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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Edmonson County Water District's November 12, 2019 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 Commission on November 12, 2019; 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 Application will be delivered to the Commission on or before November 14, 2019.



Gerald E. Wuetcher

¹ See, e.g., *Notice of Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc.*, Case No. 2003-00412 (Ky. PSC Nov. 21, 2003); *An Examination of The Application of The Fuel Adjustment Clause of Kentucky Utilities Company from November 1, 2006 Through October 31, 2008*, Case No. 2008-00520 (Ky. PSC June 3, 2009); *See also An Adjustment of Rider AMRP of the Union Light, Heat and Power Company*, Case No. 2003-00103 (Ky. PSC Aug. 29, 2003).