

COMMONWEALTH OF KENTUCKY
CASE NO. 2020-00160
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:
ELECTRONIC APPLICATION OF WATER SERVICE CORPORATION OF
KENTUCKY FOR A GENERAL ADJUSTMENT OF EXISTING RATES

MOTION TO INTERVENE ON BEHALF OF
HICKMAN COUNTY SCHOOL DISTRICT

Comes now the Hickman County School District, by counsel, and for its Motion to Intervene does hereby state as follows:

1. The Hickman County School District has its water supplied by the Water Service Corporation of Kentucky (hereinafter referred to as “WSCKY”).
2. The Hickman County School District received a notice of the proposed increase on or about June 8, 2020. The proposed notice is undated and therefore the School District is unaware as to when the notice was mailed by WSCKY. It appears that there was no publication in the local paper of record, The Hickman County Times.
3. The notice states that intervention is necessary before the expiration of thirty (30) days from the mailing or initial publication of the notice, therefore this Motion is timely..
4. The Hickman County School District is the second largest employer in the County of Hickman and the largest employer in the City of Clinton.
5. For the school year 2018-2019 the School District spent \$45,356.17 on water usage. The School District is dependent on state, federal and local government to fund its budget each year. During these unprecedented times, there is little doubt that the COVID-19 Pandemic will place a huge burden on the School District for the 2020-2021 school year. The School District expects to have substantial increases in technology expenses, supplies for both

cleaning and distance learning, instructional supplies, masks, extra staffing to handle the demands of the CDC recommendations, etc. In addition to the expected decrease in the state and federal funding, the local funding that is received by the School District will be threatened due to a reduction in SEEK Funding, loss of tax revenue, transportation costs and increases in utility rates. The funding from state, local and federal government continues to deteriorate while the cost of doing business increases.

6. An increase in the water usage rate, among other things, will have a negative impact on the amount of employees the School District is able to retain and would most certainly be an obstacle in hiring new employees whether they be classified or certified. This rate increase would directly impact the School District's ability to maintain the education level the students of our system deserve and anticipate.

7. The School District would be able to present issues and develop facts that would assist the Commission in fully considering the rate increase without unduly complicating or disrupting the proceedings.

WHEREFORE, the Hickman County School District respectfully moves this Commission for permission to intervene in this action.

Respectfully submitted,

/s/ Bryan E. Wilson _____

Bryan E. Wilson

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Atty. for Hickman County School District

CERTIFICATE OF SERVICE AND FILING

Pursuant to the Commissioner's Order dated March 17, 2020 in Case No. 2020-00085, and in accordance with applicable law, counsel certifies an electronic copy of the filing was served and filed by e-mail to the following. A physical copy of the filing will be submitted to the Commission once the State of Emergency has ceased.

1. Hon. Todd Osterioh
tosterioh@sturgillturner.com
2. Hon. James Gardner
jgardner@sturgillturner.com
3. Hon. J. Michael West
Michael.West@ky.gov
4. Hon. Lawrence W. Cook
Larry.Cook@ky.gov
5. Hon. John G. Horne II
John.Horne@ky.gov
6. Hon. Mary B. Potter
marybpotter@bellsouth.net

on this the 25th day of June, 2020.

/s/ Bryan E. Wilson _____

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June 24, 2020

Mr. Kent Chandler, Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40606-0615

Re: Water Service Corporation of Kentucky
Case No. 2020-00160

Dear Mr. Chandler:

The Hickman County School District, by counsel, hereby provides notice that it is electronically filing its Motion to Intervene in the above styled case.

The undersigned counsel certifies that the document filed electronically is a true, accurate and complete representation of the original document and has been transmitted to the Commission. No party to this case has been excused from participation by electronic means.

An original and a copy of the filing will be filed with the Commission within thirty (30) days after the lifting of the emergency, as discussed in Case No. 2020-00085.

Respectfully submitted,

Bryan E. Wilson

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