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

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ELECTRONIC PROPOSED ADJUSTMENT OF	)	
THE WHOLESALE WATER SERVICE RATES OF	)	Case No. 2020-00265
THE HARRODSBURG WATER DEPT.	)	

## MOTION TO WITHDRAW

The City of Harrodsburg ("Harrodsburg"), by counsel, respectfully moves the Public Service Commission ("Commission") for permission to withdraw its proposed wholesale rate increase. In support of the motion, Harrodsburg states as follows:

On July 14, 2020, Harrodsburg filed with the Commission a revised tariff sheet setting forth proposed adjustments to its existing rate for wholesale water service to Lake Village Water Association and North Mercer Water District effective on September 1, 2020. Harrodsburg proposed to increase the wholesale water rates by only 2.3 percent. The wholesale purchasers did not object to the proposed increase. On August 20, 2020, the Commission entered an order establishing this proceeding to investigate the reasonableness of the wholesale rates. Based on a review of prior municipal wholesale rate cases before this Commission, it appears that rate case expense for this matter would likely exceed the increase in annual revenue generated from the proposed rates. Accordingly, Harrodsburg seeks to withdraw its proposed wholesale rate increase.

Harrodsburg respectfully requests that this motion be considered Harrodsburg's notice of appearance, as required by ordering paragraph 4 of the Commission's August 20 Order. In

addition, Harrodsburg acknowledges that it waives any right to service of Commission Orders by United States mail and that the undersigned counsel, as Harrodsburg's agent, possesses the facilities to receive electronic submissions. To the extent necessary, Harrodsburg seeks leave of the Commission to file this notice of appearance and acknowledgement after the deadline set by the August 20 Order.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8(7), this is to certify that Harrodsburg's September 1, 2020, electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on September 1, 2020; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Paper copies of the foregoing shall be filed in the Commission's offices within 30 days after the state of emergency is lifted, which is consistent with the findings in Case No. 2020-00085.

Counsel for City of Harrodsburg