

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

**In the Matter of:**

<b>ELECTRONIC JOINT APPLICATION OF</b>	)	
<b>SOUTHEAST DAVIESS COUNTY WATER</b>	)	
<b>DISTRICT AND WEST DAVIESS COUNTY</b>	)	<b>CASE NO. 2020-00287</b>
<b>WATER DISTRICT FOR AN ORDER</b>	)	
<b>APPROVING THEIR MERGER</b>	)	
<b>AGREEMENT</b>	)	

**VERIFIED MOTION**

Daviess County Water District (“Daviess District”) hereby files a Verified Motion for leave to file a rate case beyond the deadline ordered by the Commission in its Order dated December 15, 2020. In support of its Verified Motion, Daviess District states:

1. Ordering paragraph 2 of the Commission’s December 15, 2020 Order in Case No. 2020-00287 requires Daviess District file for an adjustment in rates one year from the date of the final Orders in Case No. 2020-00195 and Case No. 2020-00196. The final Orders in Case No. 2020-00195 and Case No. 2020-00196 are dated January 19, 2021, making the deadline for Daviess District to file a rate case January 19, 2022.
2. Good cause exists for an extension of time for Daviess District to file a rate case for the following reasons.
3. First, as stated in the Verified Joint Application (“Merger Application”) in Case No. 2020-00287, Daviess District plans to prepare a Cost of Service Study

(“COSS”) as soon as possible following the completion of the Audit Report and PSC Annual Report for calendar year 2021. Daviess District has already contacted Kentucky Rural Water Association (“KRWA”) and requested its services to perform the COSS and to assist with the preparation of the general rate case application.

4. Second, Daviess District must file a general rate case application instead of utilizing the Alternative Rate Filing (“ARF”) procedure because its gross annual revenue will exceed the \$5,000,000 amount set forth in 807 KAR 5:076, Section 2 (Its gross annual revenue will actually exceed \$6,000,000 for calendar year 2021). Previously, the Southeast Daviess County Water District (“Southeast District”) and the West Daviess County Water District (“West District”) were eligible to use, and did utilize, the simplified and less expensive ARF procedure for their respective rate cases (See Case No. 2020-00195 and 2020-00196 for their most recent rate adjustments). Daviess District’s employees, who were the former employees of Southeast District and West District, have never filed a general rate case. Likewise, they do not possess the technical expertise to prepare a COSS. Thus, the need to engage the services of KRWA to prepare the COSS and provide assistance in preparing the general rate case application.

5. Third, because the merger of the former Southeast District and West District did not become effective until January 1, 2021, its first full year of operation did not end until December 31, 2021. Therefore, the Test Year will be calendar year 2021. It would have been inappropriate to use a Test Year commencing prior to the

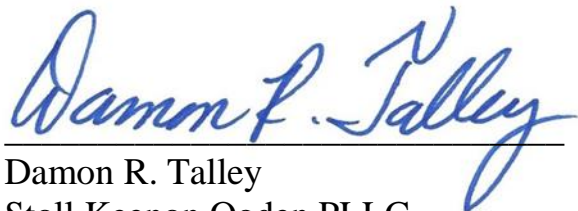
effective date of the merger.

6. As a final matter, Daviess District currently has two (2) separate rate schedules: one for its Southeast Division and one for its West Division. As stated in the Merger Application, Daviess District plans to propose a unified rate schedule for all its retail water customers. This will achieve one of the merger goals of having all retail customers pay the same rates regardless of their location. Daviess District has instructed KRWA to propose a unified rate schedule in the general rate case that will be filed on or before June 30, 2022.

**WHEREFORE**, Daviess District respectfully requests that the Commission grant Daviess District's motion for leave to file a rate case beyond the deadline ordered by the Commission and permit Daviess District to file a general rate case on or before June 30, 2022.

Dated: January 6, 2022

Respectfully submitted,



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*Counsel for Daviess County Water  
District*

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS  
COUNTY OF DAVIESS )

The undersigned, Christina V. O'Bryan, being duly sworn, deposes and states that she is the Chairman of Daviess County Water District; that she has read this Verified Motion and has noted its contents; that the same is true of her own knowledge, except as to those matters which are therein stated on information or belief, and as to those matters, she believes same to be true.

IN TESTIMONY WHEREOF, witness the signature of the undersigned on this \_\_\_ day of January, 2022.

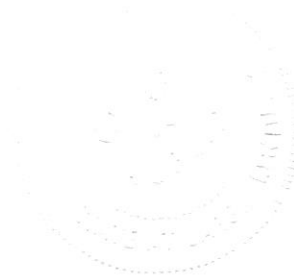
Christina V O Bryan  
Christina V. O'Bryan, Chairman  
Daviess County Water District

Subscribed and sworn to before me, a Notary Public in and for said County and State, by Christina V. O'Bryan, in her capacity as Chairman of Daviess County Water District, on this 5<sup>th</sup> day of January, 2022.

Mary Bell  
Notary Public, State at Large

Notary ID: KYNP6007

My Commission expires: May 12, 2024



## CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on January 6, 2022; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

  
Damon R. Talley