

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF GARRISON-)	
QUINCY-KY-O-HEIGHTS WATER DISTRICT FOR)	CASE NO.
A RATE ADJUSTMENT PURSUANT TO 807 KAR)	2021-00094
5:076)	

MOTION FOR SUSPENSION/DEVIATION OF SEWER RATE INCREASE

Comes the Garrison-Quincy-KY-O-Heights Water District (District), by counsel, and moves for the following relief:

1. The Commission, in the above styled case issued an Order, entered on November 24, 2021 that required the Sewer Division of the District to increase its monthly sewer rates in three, one year phases as follows (as stated in Appendix B of said Order):

	PHASE 1	
First 2,000 Gallons		\$31.90 minimum bill
Over 2,000 Gallons		0.01595 per gallon
	PHASE 2	
First 2,000 Gallons		\$36.69 minimum bill
Over 2,000 Gallons		0.01834 per gallon
	PHASE 3	
First 2,000 Gallons		\$42.19 minimum bill
Over 2,000 Gallons		0.02109 per gallon

2. As directed by the Commission's Order, the Phase 1 rate was implemented beginning on January 1, 2022. Phase 2 is set to be implemented on January 1, 2023 and Phase 3 on January 1, 2024.
3. As directed by the Commission's Order, the District took multiple steps within its accounting procedures and internal controls to properly allocate costs and revenues among

the water division and sewer division of the district as was stated by the District in its Post Case Referenced Correspondence on January 24, 2022.

4. Based on the steps the District took to properly allocate the costs and revenues among the two divisions and the Phase 1 rate increase that was implemented, the District now believes that the sewer division is being properly funded by the revenue generated by the Phase 1 rate increase.
5. Further, the District based on the belief that the sewer division is being properly funded through the current rate, the District's Board of Directors is concerned about the increase of rates on its customers and the hardship it may cause.
6. Because the District took steps to better allocate expenses and revenue among the water and sewer divisions, the District requests the Commission to suspend the implementation of the Phase 2 Sewer rates and allow the District to continue on January 1, 2023 to use the Phase 1 Sewer rates.

The information provided is true and correct to the best of my knowledge information and belief formed after a reasonable inquiry.

/s/ Benjamin L. Harrison
BENJAMIN L. HARRISON
COUNSEL FOR GARRISON-QUINCY-
KY-O-HEIGHTS WATER DISTRICT
STANLEY & BERTRAM, PSC
PO Box 40
Vanceburg, KY 41179
606-796-3024; 606-796-2113 – FAX
bharrison50@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of October, 2022, a copy of the foregoing Motion has been mailed, USPS postage prepaid, and filed electronically, to the following:

Public Service Commission
PO Box 615
Frankfort, KY 40602
And by E-Filing System

/s/ Benjamin L. Harrison
BENJAMIN L. HARRISON