

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

AMENDED MOTION FOR SUSPENSION/DEVIATION OF SEWER RATE INCREASE

---

Comes the Garrison-Quincy-KY-O-Heights Water District (District), by counsel, and amends its Motion that was filed on October 13, 2022 to state as follows :

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, 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. The District requests that an additional rate study of the District's sewer division be undertaken after the District's 2022 financial information becomes available.
7. The District believes that the 2022 financial reports will show a more proper allocation of revenues and expenses among the water and sewer divisions and show that a further rate increase is not needed.
8. 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 until a new rate study is commissioned so that the District's 2022 financial reports can be analyzed.

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](mailto:bharrison50@gmail.com)

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> 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