

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 for its Motion for Suspension/Deviation of Sewer Rate Increase states 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. The Phase 2 rate was implemented on January 1, 2023. The Phase 3 rate is set to be implemented 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 and Phase 2 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 and Phase 2 rate increase.
5. In its Order of November 10, 2022, the Commission stated, “Should Garrison District find it necessary after the implementation of Phase 2 rates to adjust the sewer rates prescribed in the November 24, 2021 Order, it should file a new rate case with the Commission for a full investigation of any new proposed rates.” The District has in fact filed a new rate case with the Commission for the purpose of an investigation of rates (Case # 2023-00359).
6. Further, based on the belief that the sewer division is being properly funded through the current Phase 2 rate, the District’s Board of Directors is concerned about the increase of rates on its customers and the hardship it may cause.
7. Because the District implemented Phase 2 sewer rates on its customers, took steps to better allocate expenses and revenue among the water and sewer divisions, and filed a new Commission case for the purpose of investigation of rates, the District requests the Commission to suspend the implementation of the Phase 3 Sewer rates and allow the District to continue on January 1, 2022 to use the Phase 1 Sewer rates until the completion of rates investigation by the Commission.

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
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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of December, 2023, 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