

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC MORGAN COUNTY WATER)	CASE NO.
DISTRICT'S UNACCOUNTED FOR WATER LOSS)	2021-00206
REDUCTION PLAN, SURCHARGE AND)	
MONITORING)	

MOTION TO TERMINATE SURCHARGE

Comes now Morgan County Water District, by and through Counsel, and respectfully requests that the \$5.87 monthly surcharge per active meter approved by The Commission in Case No. 2020-00386 and monitored by The Commission in Case No. 2021-00206 be terminated. As grounds therefore, Morgan County Water District states as follows:

1. That per the Order entered by The Commission on June 9, 2021 in the above captioned case Morgan County Water District is "to assess a monthly surcharge of \$5.87 per active meter for 48 months, or until \$399,726 has been assessed, whichever occurs first, to fund its unaccounted for water loss reduction efforts as set forth in Case No. 2020-00386."

2. That after the District's July billing cycle, \$396,115.72 of surcharge funds had been collected in total. As this total was within \$3,610.28 of the \$399,726 cap set by The Commission, the District removed the surcharge prior to the August customer bills being issued. *Documentation of the surcharge account balance has been attached and incorporated as Exhibit A.*

3. That had the surcharge remained on the customer bills for August, the District estimates that the surcharge cap of \$399,726 would have been exceeded by approximately \$12,389.72. The District, having no way to end the surcharge precisely when the cap amount was

reached and wanting to avoid what they viewed as tantamount to an unapproved rate increase, chose to remove the surcharge before any over collection could occur.

4. That some surcharge funds are continuing to be collected on late bill payments.

WHEREFORE, Morgan County Water District respectfully requests that the Commission enter an Order terminating the previously ordered \$5.87 monthly surcharge retroactively to the end of the July 2023 billing cycle as the surcharge cap has effectively been met.

Respectfully Submitted:



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EXHIBIT A

SURCHARGE ACCOUNT BALANCES

		CREDIT				DEBIT	
	Required Deposit		Actual Deposit				
21-Aug	\$ 15,726.70	21-Aug	\$ 15,570.14	\$ (156.56)	Nesbit Engineering	\$ 14,702.50	11/9/2021
21-Sep	\$ 17,205.06	21-Sep	\$ 16,359.17	\$ (845.89)	McKeand & Creed	\$ 26,995.00	12/27/2021
21-Oct	\$ 15,934.86	21-Oct	\$ 16,139.34	\$ 204.48	BearTraxx	\$ 30,480.00	3/11/2022
21-Nov	\$ 16,414.32	21-Nov	\$ 16,840.16	\$ 425.84	Gatormade	\$ 5,990.00	10/12/2022
21-Dec	\$ 16,401.54	21-Dec	\$ 16,343.23	\$ (58.31)	Hydro-Stop	\$ 4,604.00	10/12/2022
22-Jan	\$ 17,642.31	22-Jan	\$ 15,735.94	\$ (1,906.37)	Metron	\$ 8,543.64	10/12/2022
22-Feb	\$ 15,388.91	22-Feb	\$ 18,226.67	\$ 2,837.76	SE Diving	\$ 7,000.00	2/14/2023
22-Mar	\$ 17,575.83	22-Mar	\$ 14,801.55	\$ (2,774.28)	Metron	\$ 7,825.00	2/14/2023
22-Apr	\$ 16,226.55	22-Apr	\$ 16,324.00	\$ 97.45	Keetech	\$ 42,620.00	2/14/2023
22-May	\$ 17,366.89	22-May	\$ 16,011.66	\$ (1,355.23)	Beartraxx	\$ 10,160.00	3/2/2023
22-Jun	\$ 14,673.44	22-Jun	\$ 15,725.23	\$ 1,051.79	BearTraxx	\$ 50,800.00	3/25/2023
22-Jul	\$ 15,307.66	22-Jul	\$ 3,047.40	\$ (12,260.26)	Metron	\$ 18,863.00	3/25/2023
22-Aug	\$ 16,422.24	22-Aug	\$ 14,453.28	\$ (1,968.96)	Keetech	\$ 56,860.70	3/25/2023
22-Sep	\$ 17,102.13	22-Sep	\$ 18,899.48	\$ 1,797.35	Metron	\$ 14,605.00	3/27/2023
22-Oct	\$ 16,578.20	22-Oct	\$ -	\$ (16,578.20)	Metron	\$ 9,242.00	4/18/2023
22-Nov	\$ 17,255.76	22-Nov	\$ 20,686.60	\$ 3,430.84	ASTERRA	\$ 40,000.00	5/8/2023
22-Dec	\$ 16,437.55	22-Dec	\$ 17.24	\$ (16,420.31)	ASTERRA	\$ 39,500.00	10/4/2023
23-Jan	\$ 18,417.58	23-Jan	\$ 9,897.07	\$ (8,520.51)			
23-Feb	\$ 14,604.35	23-Feb	\$ 21,524.04	\$ 6,919.69			
23-Mar	\$ 17,836.87	23-Mar	\$ 42,576.37	\$ 24,739.50			
23-Apr	\$ 16,841.70	23-Apr	\$ 22,280.92	\$ 5,439.22			
23-May	\$ 16,117.34	23-May	\$ 22,768.66	\$ 6,651.32			
23-Jun	\$ 17,429.94	23-Jun	\$ 16,130.79	\$ (1,299.15)			
23-Jul	\$ 15,207.99	23-Jul	\$ 16,177.30	\$ 969.31			
		23-Aug	\$ 9,579.48	\$ 9,579.48			
	<u>\$ 396,115.72</u>		<u>\$ 396,115.72</u>	<u>\$ -</u>		<u>\$ 388,790.84</u>	
	\$ 399,726.00	Case # 2021-00206				\$ 7,324.88	
	\$ 3,610.28	difference				\$ 7,324.88	