COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

ELECTRONIC TARIFF FILING OF RICHMOND WATER, GAS & SEWERAGE WORKS REVISING ITS WHOLESALE WATER SERVICE RATES

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Case No. 2021-00239

MOTION TO WITHDRAW

The Richmond Water, Gas & Sewerage Works ("Richmond Water"), by counsel, respectfully moves the Public Service Commission for permission to withdraw its proposed wholesale rate increase. In support of the motion, Richmond Water states as follows:

On May 5, 2021, Richmond Water filed with the Commission a revised tariff sheet setting forth proposed adjustments to its existing rate for wholesale water service to Kirksville Water Association and Madison County Utilities District effective on July 1, 2021. Richmond Water proposed to increase the wholesale water rates by only 1.2 percent. The wholesale purchasers did not object to the proposed increase. On June 21, 2021, the Commission entered an order establishing this proceeding to investigate the reasonableness of the wholesale rates. Based on a review of prior municipal wholesale rate cases before this Commission, it appears that rate case expense for this matter would likely exceed the increase in annual revenue generated from the proposed rates. In addition, Richmond Water's Board rescinded the proposed wholesale rate increase on June 30, 2021, and it plans to commission a rate study following completion of the Fiscal Year 2021 financial audit. Accordingly, Richmond Water seeks to withdraw its proposed wholesale rate increase, which would include relieving Richmond Water from filing responses to the Commission's initial request for information. Richmond Water further supplements the record to include this notice of appearance, as

the undersigned counsel is appearing as co-counsel.

For the above-mentioned reasons, Richmond Water respectfully requests an order from

the Commission granting its Motion and removing this case from the Commission's docket.

Respectfully submitted,

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Attorneys for Richmond Water

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8(7), this is to certify that Richmond Water's July 13, 2021, electronic filing is a true and accurate copy of the documents to be filed in paper medium; that the electronic filing has been transmitted to the Commission on July 13, 2021; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Paper copies of the foregoing shall be filed in the Commission's offices within 30 days after the state of emergency is lifted, which is consistent with the findings in Case No. 2020-00085.

Counsel for Richmond Water