

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BRACKEN)
COUNTY WATER DISTRICT FOR AN) CASE NO. 2021-00415
ADJUSTMENT OF ITS WATER RATES)
PURSUANT TO 807 KAR 5:076)

MOTION TO AMEND ORDER

Pursuant to KRS 278.400, Bracken County Water District (“Bracken District”) moves to amend the Public Service Commission’s Order of September 27, 2022, to provide that the rates for water service take effect with meter readings performed after October 15, 2022, instead of the stated effective date.

In support of its motion, Bracken District states:

1. Bracken District reads its meters monthly between the tenth and twelfth days of the month using automated meter reading equipment. While the billing period for every customer has the same number of days, the specific days in that period may differ. (For example, all bills may cover a 30-day period. Some bills, however, will cover water usage from the tenth day of the previous month to the tenth day of the present month, while others will cover usage from the eleventh day of the previous month to the eleventh of the present month.)

2. In its Order of September 27, 2022, the Public Service Commission established new rates for Bracken District effective for service rendered on and after September 27, 2022. The effective date of these new rates falls within a billing cycle rather than at the start of a billing cycle. Therefore, when determining the amount of bills for service received during the first billing cycle in which the new rates are effective, two different rate schedules are applied to each customer’s water usage to determine the amount owed for service.

3. Since customer meters were not read on September 27, 2022, Bracken District is unable to determine customer usage occurring during the portion of the billing cycle in which the prior rates were effective and that occurring after the new rates became effective. While Bracken District can develop rates for the transition period (September 10 – October 10) to implement the Order of September 27, 2022, that effort requires additional effort, creates customer confusion over the rates in effect, and does not ensure an accurate bill for actual usage is assessed.

4. To address these concerns, Bracken District requests that the Public Service Commission amend its Order of September 27, 2022, to make the new rates effective for meter readings after October 15, 2022. This revision will permit an orderly transition to the new rates, avoid the need to develop a transition rate to account for the presence of two different rate schedules during one billing cycle, ensure all customers are billed for water service at the new rates in the same manner, and avoid customer confusion. Bracken District will begin assessing the new rates for service rendered after meters are read in mid-October 2022 and a new billing cycle has commenced. All bills issued in November 2022 for the new billing cycle will reflect the new rates.

5. Placing new rates into effect based upon a utility's billing cycle is not unusual. The Public Service Commission has followed this practice for several years in proceedings in which it adjusted fuel adjustment charges and gas cost recovery mechanisms.¹ It will allow for an orderly

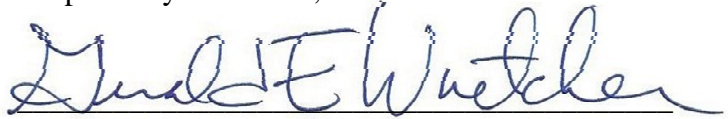
¹ See, e.g., *Notice of Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc.*, Case No. 2003-00412 (Ky. PSC Nov. 21, 2003); *An Examination of The Application of The Fuel Adjustment Clause of Kentucky Utilities Company from November 1, 2006 Through October 31, 2008*, Case No. 2008-00520 (Ky. PSC June 3, 2009); See also *An Adjustment of Rider AMRP of the Union Light, Heat and Power Company*, Case No. 2003-00103 (Ky. PSC Aug. 29, 2003); *Electronic Application of Edmonson County Water District Pursuant to KRS 278.023 and 807 KAR 5:069 for a Certificate of Public Convenience and Necessity to Expand its Water Treatment Plant and Related Waterworks Improvements, an Adjustment of Its Rates for Water Service; and Authorization to Issue Certain Securities*, Case No. 2019-00355 (Ky. PSC Dec. 2, 2019)

and less costly transition to the newly approved rates while ensuring all customers are treated in an equitable and uniform manner.

WHEREFORE, Bracken County Water District requests the Public Service Commission amend its Order of September 27, 2022, to provide that the new rates for water service will become effective for meter readings performed after October 15, 2022.

Dated: September 29, 2022

Respectfully submitted,



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Counsel for Bracken County Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, and the Public Service Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was transmitted to the Public Service Commission on September 29, 2022 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.



Gerald E. Wuetcher