

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC APPLICATION OF)
WATER SERVICE CORPORATION) CASE NO. 2022-00147
OF KENTUCKY FOR A GENERAL)
ADJUSTMENT IN EXISTING RATES)

**MOTION BY CITY OF CLINTON TO ALLOW SHANNON PAYNE
TO TESTIFY VIRTUALLY OR IN THE ALTERNATIVE
TO ACCEPT TESTIMONY AS SUBMITTED**

Comes the City of Clinton and respectfully moves for an Order allowing Clinton City Clerk Shannon Payne to testify virtually at the hearing scheduled for November 30, 2022 at the Kentucky Public Service Commission offices in Frankfort.

The City of Clinton had no objection to virtual testimony of witnesses for Water Service Kentucky. Virtual testimony by witnesses is becoming more the norm in the courts of Kentucky rather than the exception. Therefore, the City of Clinton saw no reason to object to virtual testimony as long as the opportunity exists to observe the witness and to cross examine as needed.

When testimony by Clerk Payne was prepared and filed, the City assumed, based upon the last rate increase hearing of 2020, that she would not be required to travel to Frankfort, a distance of 286 miles. Travel for the hearing will be a three-day commitment for the Clerk: traveling to the hearing, attending the hearing and traveling back to Clinton. Clerk Payne has one assistant whose duties are limited to accepting and recording payments, answering the phone and taking messages. The assistant will be hard pressed to fulfill both her duties and the Clerk's.

Some duties the assistant clerk cannot perform under the terms of Clinton's city ordinances. Clerk Payne also serves as treasurer for the City, authorized to prepare checks for payroll and bills. The assistant does not have that authorization. The timing of the hearing at the end of a calendar month and the beginning of a new month makes the Clerk's absence a strain on City resources and potentially a hardship on residents of the City.

The Clerk's duties include preparing for Clinton City Council meetings held the first Monday of most months, including December. There are multiple financial reports to be submitted in advance to the mayor and council members' before the meeting. It will be difficult for her to prepare for the December council meeting if she is in Frankfort a few days before the meeting on December 5th.

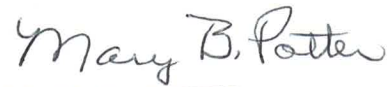
When Clerk Payne testified in 2020, she was the last person on the roster of witnesses. She stayed in her office and watched the proceedings while performing as many of her duties as possible. During breaks, she was able to complete other duties. There was no cross examination. If history comes close to repeating itself, her testimony as an Intervenor witness will be more efficiently and economically addressed by allowing her to remain in her office and testify virtually.

Allowing the Clerk to remain in her office, available for other city business until such time she is required to provide testimony will not impede the conduct of the hearing. Her presence throughout the hearing will add no new information until such time she is needed to affirm her written testimony.

Therefore, the City of Clinton respectfully requests that its witness, Clinton City Clerk Shannon Payne, be allowed to testify virtually or that in the alternative, her testimony stand as submitted without an additional appearance. Alternatively, the City of Clinton requests that her

testimony be admitted as submitted and no appearance be necessary.

Respectfully submitted

A handwritten signature in cursive script that reads "Mary B. Potter".

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