

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Electronic Application of Water Service )  
Corporation of Kentucky for a General ) Case No. 2022-00147  
Adjustment in Existing Rates and a Certificate )  
of Public Convenience and Necessity to Deploy )  
Advanced Metering Infrastructure and Approval )  
of Certain Regulatory Accounting Treatment )

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**APPLICATION**

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Water Service Corporation of Kentucky (“WSCK”), by counsel, submits its Application for an increase in rates pursuant to KRS 278.190 to be effective July 1, 2022, and for a certificate of public convenience and necessary to deploy advanced metered infrastructure pursuant to KRS 278.020. In support of this Application, WSCK states as follows:

1. Water Service Corporation of Kentucky is a Kentucky corporation, The mailing address of WSCK is 500 West Monroe St. Suite 3600, Chicago, Illinois, 60661. WSCK can be reached via e-mail through its counsel as set forth below.
2. WSCK has elected to use the electronic filing procedures authorized by 807 KAR 5:001, Section 8. This Application shall be filed electronically; no paper copy of the Application shall be filed in accordance with prior Commission directives.
3. WSCK is a wholly-owned subsidiary of Corix Regulated Utilities (US) Inc. (“CRU”).

4. WSCK currently owns and operates water production, transmission, and distribution facilities in the cities of Middlesboro and Clinton. It serves approximately 6,147 customers, or 7,047 Equivalent Residential Customers (“ERCs”).

5. Pursuant to KRS 278.180, KRS 278.190 and 807 KAR 5:001, Section 16(1)(b)(1), WSCK is requesting an increase in rates because its existing rates for water service do not afford WSCK the opportunity to recover its reasonable operating costs or to earn a just and reasonable rate of return on the investments made. WSCK must be granted a rate increase at this time in order to maintain its facilities and provide service commensurate with its customers’ reasonable expectations and the Public Service Commission’s requirements. The reasons for the proposed increase are more fully explained in testimonies of Seth Whitney and James Kilbane attached as Exhibits No. 9.1 and 9.2, respectively.

6. As authorized by KRS 278.192(1) and for the purpose of justifying the reasonableness of the proposed increase in rates, WSCK has utilized a forward-looking test period (“Forecast Period”) corresponding to the first twelve consecutive calendar months the proposed rates will be in effect after the six-month suspension of the proposed rates. The Forecast Period is the twelve months ending December 31, 2023 (January 1, 2023 to December 31, 2023).

7. WSCK has used, in the attached exhibits, a Base Period consisting of the twelve months ending September 30, 2022 (October 1, 2021 – September 30, 2022). This Base Period begins not more than nine months prior to the date of the filing of this Application, and is a period consisting of not less than six months of actual historical data and not more than six (6) months of estimated data, all as authorized by KRS 278.192(2)(a).

8. Within forty-five days after the last day of the Base Period, WSCK will file the actual results for the estimated months of the Base Period as required by KRS 278.192(2)(b).

9. WSCK's annual reports, including the annual report for 2021, are on file with the Public Service Commission as required by 807 KAR 5:006, Section 4.

10. In accordance with KRS 278.180, WSCK hereby gives notice to the Public Service Commission of the adjustment of its rates from those set forth in Exhibit No. 1 to those rates set forth in Exhibit No. 2 in order to eliminate a revenue deficiency of \$1,047,688 on an annual basis. This will result in a 32.12% increase in water service revenues. The percentage increase will be applied uniformly to all customer classes. A comparison of the current and proposed rates is set forth in attached Exhibit Nos. 3 and 29, Schedule A. Exhibits Nos. 1, 2 and 29, Schedule A are also provided in accordance with 807 KAR 5:001, Section 16(1)(b)(3)-(4).

11. The effect upon the average bill for each customer class that the proposed rate change will apply is shown in Exhibit 29, Schedule A.

12. A certified copy of the articles of incorporation was filed in Case No. 2002-00142, and a copy is being attached as Exhibit 4. WSCK was incorporated in Kentucky on April 12, 2002. A copy of a recent Certificate of Authorization is attached as Exhibit No. 5, and WSCK attests that it is a corporation in good standing in Kentucky.

13. The legal name of the applicant is Water Service Corporation of Kentucky. It does business under the assumed name of Water Service Corp. of Kentucky and has filed a Certificate of Assumed Name as required by KRS 365.015. A certified copy of the Certificate of Assumed Name as required by 807 KAR 5:001, Section 16(1)(b)(2) is attached as Exhibit No. 6.

14. WSCK has complied with 807 KAR Section 5:001, Section 17(1)(a)-(b)(2) by the following: (1) posting at its place of business a copy of the Customer Notice no later than the

date this Application is submitted to the Commission; and (2) within five (5) business days of the date this Application is submitted to the Commission, posting on its website copy of the public notice and a hyperlink to the location on the Commission's website where the case documents are available. In accordance with 807 KAR 5:001, Section 17(2)(b)(2), WSCK mailed a typewritten Customer Notice to all customers on May 27, 2022, and thus no later than the date of this Application. A copy of the Customer Notice is attached as Exhibit No. 7. Proof of notice will be filed with the Commission within 45 days pursuant to 807 KAR 5:001, Section 17(3).

15. In support of its application for a general adjustment of rates supported by a fully forecasted test year, WSCK has presented its financial data for the Forecast Period in the form of pro-forma adjustments to the Base Period. WSCK has limited the forecasted adjustments to the twelve (12) calendar months immediately following the suspension period, and has based capitalization and net investment rate base on a thirteen (13) month average for the forecasted period, all as set forth in 807 KAR 5:001, Section 16(6)(a)(b) and (c).

16. New tariff sheets are presented as Exhibit No. 2. Present tariffs indicating proposed additions by underscoring and striking over proposed deletions are attached as Exhibit No. 3.

17. Because WSCK's gross annual revenue is not greater than \$5,000,000, it is exempt from the notice requirements of 807 KAR 5:001, Section 16(2).

18. In further support of its application for a general adjustment of rates supported by a fully forecasted test year, WSCK attaches the following documents or explains their absence:

<b>Filing Requirements</b>	<b>Abbreviated Requirement Description</b>	<b>Location or Absence Reason</b>
KRS 278.180	30 days' notice of rates to Commission	Exhibit 2
807 KAR 5:001 Section 14(1)	Full name, mailing address, and e-mail address of applicant	Paragraph 1 above
807 KAR 5:001 Section 14(1)	A reference to the particular provision of law requiring Commission approval	Within this Application
807 KAR 5:001 Section 7(1)	The application and 10 copies	Copies no longer required per PSC order
807 KAR 5:001 Section 4(3)	Paper signed by submitting party or attorney	See signature block below
807 KAR 5:001 Section 4(3)	Name, address, telephone number, fax number, and e-mail address of submitting party or attorney.	See signature block below
807 KAR 5:001 Section 14(4)	If applicant is a limited partnership, a certified copy of its limited partnership agreement and all amendments, or a written statement that its partnership agreement and all amendments have been filed with the Commission in a prior proceeding and a reference to the case number of that proceeding.	Not applicable to WSKC
807 KAR 5:001 Section 16(1)(b)1	A statement of the reason the adjustment is required	Within this Application
807 KAR 5:001 Section 16(1)(b)2	A certified copy of a certificate of assumed name as required by KRS 365.015 or a statement that such a certificate is not necessary.	Exhibit 6
807 KAR 5:001 Section 16(1)(b)3	New or revised tariff sheets, if applicable, in form complying with 807 KAR 5:011 with an effective date not less than thirty (30) days from the date the application is filed.	Exhibit 2

807 KAR 5:001 Section 16(1)(b)4	New or revised tariff sheets, if applicable, shown either by providing the present and proposed tariffs in comparative form on the same sheet side by side or on facing sheets side by side, or providing a copy of the present tariff indicating proposed additions by italicized inserts or underscoring and striking over proposed deletions.	Exhibits 3
807 KAR 5:001 Section 16(1)(b)5	Statement that notice has been given in compliance with Section 17 of this administrative regulation, with a copy of the notice.	Exhibit 7
807 KAR 5:001 Section 16(2)	If gross annual revenues exceed \$5,000,000, was written notice of intent to file a rate application filed at least thirty (30) days, but not more than sixty (60) days prior to application?	N/A because WSCK does not exceed \$5M in annual revenue
807 KAR 5:001 Section 16(2)(a)	Notice shall state whether the application will be supported by historical or a fully forecasted test period	N/A because WSCK does not exceed \$5M in annual revenue
807 KAR 5:001 Section 16(2)(c)	Has a copy of the notice of intent been served upon the Attorney General, either by electronic mail in a portable document format or mail?	N/A because WSCK does not exceed \$5M in annual revenue
807 KAR 5:001 Section 16(6)(a)	Financial data for forecasted period presented as pro forma adjustments to base period.	Exhibits as applicable
807 KAR 5:001 Section 16(6)(b)	Forecasted adjustments shall be limited to the 12 months immediately following the suspension period.	Exhibits as applicable
807 KAR 5:001 Section 16(6)(c)	Capitalization and net investment rate base shall be based on a 13-month average for the forecasted period.	Exhibits 28 Schedule A and 35 Schedule A
807 KAR 5:001 Section 16(6)(f)	Reconciliation of the rate base and capital used to determine its revenue requirements.	Exhibit 8

807 KAR 5:001 Section 16(7)(a)	Written testimony of each witness supporting its application including testimony from chief officer in charge of Kentucky operations on the existing programs to achieve improvements in efficiency and productivity, including an explanation of the purpose of the program;	Exhibits 9.1 through 9.7
807 KAR 5:001 Section 16(7)(b)	Most recent capital construction budget containing at minimum a 3-year forecast of construction expenditures;	Exhibit 10
807 KAR 5:001 Section 16(7)(c)	Complete description, which may be in written testimony form, of all factors used to prepare forecast period. All econometric models, variables, assumptions, escalation factors, contingency provisions, and changes in activity levels shall be quantified, explained, and properly supported;	Exhibit 11
807 KAR 5:001 Section 16(7)(d)	Annual and monthly budget for 12 months preceding the filing date, the base period and the forecasted period	Exhibit 12
807 KAR 5:001 Section 16(7)(e)	Attestation signed by utility's chief officer in charge of Kentucky operations providing:	Exhibit 13
807 KAR 5:001 Section 16(7)(e)1	That forecast is reasonable, reliable, made in good faith and that all basic assumptions used have been identified and justified; and	Exhibit 13
807 KAR 5:001 Section 16(7)(e)2	That forecast contains same assumptions and methodologies used in forecast prepared for use by management, or an identification and explanation for any differences; and	Exhibit 13
807 KAR 5:001 Section 16(7)(e)3	That productivity and efficiency gains are included in the forecast;	Exhibit 13
807 KAR 5:001 Section 16(7)(f)	For each major construction project constituting 5% or more of annual construction budget within 3-year forecast, following information shall be filed:	Exhibit 10

807 KAR 5:001 Section 16(7)(f)1	Date project began or estimated starting date;	Exhibit 10
807 KAR 5:001 Section 16(7)(f)2	Estimated completion date;	Exhibit 10
807 KAR 5:001 Section 16(7)(f)3	Total estimated cost of construction by year exclusive and inclusive of Allowance for Funds Used During Construction (“AFUDC”) or Interest During Construction Credit; and	Exhibit 10
807 KAR 5:001 Section 16(7)(f)4	Most recent available total costs incurred exclusive and inclusive of AFUDC or Interest During Construction Credit;	Exhibit 10
807 KAR 5:001 Section 16(7)(g)	For all construction projects constituting less than 5% of annual construction budget within 3-year forecast, file aggregate of information requested in paragraph (f) 3 and 4 of this subsection;	Exhibit 10
807 KAR 5:001 Section 16(7)(h)	Financial forecast for each of 3 forecasted years included in capital construction budget supported by underlying assumptions made in projecting results of operations and including the following information:	See below
807 KAR 5:001 Section 16(7)(h)1	Operating income statement (exclusive of dividends per share or earnings per share);	Exhibit 14
807 KAR 5:001 Section 16(7)(h)2	Balance sheet	Exhibit 15
807 KAR 5:001 Section 16(7)(h)3	Cash flow statement	Exhibit 16
807 KAR 5:001 Section 16(7)(h)4	Revenue requirements necessary to support the forecasted rate of return;	Exhibit 14
807 KAR 5:001 Section 16(7)(h)5	Load forecast including energy and demand (electric);	Not applicable to water utilities



807 KAR 5:001 Section 16(7)(h)6	access line forecast (telephone);	Not applicable for WSCK
807 KAR 5:001 Section 16(7)(h)7	generation mix (electric);	Not applicable to water utilities
807 KAR 5:001 Section 16(7)(h)8	Mix of gas supply (gas);	Not applicable to water utilities
807 KAR 5:001 Section 16(7)(h)9	employee level	Exhibit 17
807 KAR 5:001 Section 16(7)(h)10	labor cost changes	Exhibit 18
807 KAR 5:001 Section 16(7)(h)11	capital structure requirements	Exhibit 19
807 KAR 5:001 Section 16(7)(h)12	rate base	Exhibit 20
807 KAR 5:001 Section 16(7)(h)13	Gallons of water projected to be sold (water);	Exhibit 29 Schedule A
807 KAR 5:001 Section 16(7)(h)14	Customer forecast (gas, water);	Exhibit 29 Schedule A
807 KAR 5:001 Section 16(7)(h)15	Sales volume forecasts – cubic feet (gas);	Not applicable to water utilities
807 KAR 5:001 Section 16(7)(h)16	Toll and access forecast of number of calls and number of minutes (telephone); and	Not applicable to water utilities
807 KAR 5:001 Section 16(7)(i)	Most recent FERC or FCC audit reports	Not applicable to water utilities
807 KAR 5:001 Section 16(7)(j)	Prospectus of most recent stock/bond offerings	Not applicable to WSCK

807 KAR 5:001 Section 16(7)(k)	Most recent FERC Form 1 (electric), FERC Form 2 (gas), or and PSC Form T (telephone);	Not applicable to WSKC
807 KAR 5:001 Section 16(7)(l)	Annual report to shareholders or members and statistical supplements covering the most recent 2 years from the application filing date;	Not applicable to WSKC
807 KAR 5:001 Section 16(7)(m)	Current chart of accounts if more detailed than Uniform System of Accounts chart;	Exhibit 21
807 KAR 5:001 Section 16(7)(n)	Latest 12 months of the monthly managerial reports providing financial results of operations in comparison to forecast;	Exhibit 22
807 KAR 5:001 Section 16(7)(o)	Complete monthly budget variance reports, with narrative explanations, for the 12 months immediately prior to base period, each month of base period, and subsequent months, as available;	Exhibit 22
807 KAR 5:001 Section 16(7)(p)	SEC's annual report (Form 10-K) for most recent 2 years, any Form 8-Ks issued during past 2 years, and any Form 10-Qs issued during past 6 quarters;	Not applicable to WSKC
807 KAR 5:001 Section 16(7)(q)	Independent auditor's annual opinion report, with any written communication from auditor which indicates the existence of a material weakness in internal controls;	Exhibit 23
807 KAR 5:001 Section 16(7)(r)	Quarterly reports to the stockholders for the most recent 5 quarters;	Not applicable to WSKC
807 KAR 5:001 Section 16(7)(s)	Summary of latest depreciation study with schedules itemized by major plant accounts, except that telecommunications utilities adopting Commission's average depreciation rates shall identify current and base period depreciation rates used by major plant accounts. If information has been filed in another commission case, refer to that case's number;	Exhibit 24

807 KAR 5:001 Section 16(7)(t)	List all commercial or in-house computer software, programs, and models used to develop schedules and work papers associated with application. Include each software, program, or model; its use; identify the supplier of each; briefly describe software, program, or model; specifications for computer hardware and operating system required to run program;	Exhibit 25
807 KAR 5:001 Section 16(7)(u)	If the utility had any amounts charged or allocated to it by an affiliate or general or home office or paid any monies to an affiliate or general or home office during the base period or during the previous three (3) calendar years, the utility shall file:	See below
807 KAR 5:001 Section 16(7)(u)1	Detailed description of method of calculation and amounts allocated or charged to utility by affiliate or general or home office for each allocation or payment;	Exhibits 26, 29 Schedule C, 9.2 and 9.3
807 KAR 5:001 Section 16(7)(u)2	Method and amounts allocated during base period and method and estimated amounts to be allocated during forecasted test period;	Exhibit 29 Schedule C
807 KAR 5:001 Section 16(7)(u)3	Explain how allocator for both base and forecasted test period was determined; and	Exhibit 9.2
807 KAR 5:001 Section 16(7)(u)4	All facts relied upon, including other regulatory approval, to demonstrate that each amount charged, allocated or paid during base period is reasonable;	Exhibits 9.2, 9.3, and 9.4
807 KAR 5:001 Section 16(7)(v)	If gas, electric, sewage or water utility, whose annual gross revenues exceed \$5,000,000 in the division for which a rate adjustment is sought, a cost of service study based on methodology generally accepted in industry and based on current and reliable data from single time period;	Not applicable to WSCK because it does not have \$5M in annual revenues
807 KAR 5:001 Section 16(7)(w)	Local exchange carriers with fewer than 50,000 access lines need not file cost of service studies, except as specifically directed by PSC. Local exchange carriers with more than 50,000 access	Not applicable to water utilities

	lines shall file:	
807 KAR 5:001 Section 16(7)(w)1	Jurisdictional separations study consistent with 47 C.F.R. Part 36 of the FCC's rules and regulations; and	Not applicable to water utilities
807 KAR 5:001 Section 16(7)(w)2	Service specific cost studies supporting pricing of services that generate annual revenue greater than \$1,000,000 except local exchange access:	Not applicable to water utilities
807 KAR 5:001 Section 16(7)(w)2a	Based on current and reliable data from single time period; and	Not applicable to water utilities
807 KAR 5:001 Section 16(7)(w)2b	Using generally recognized fully allocated, embedded, or incremental cost principles.	Not applicable to water utilities
807 KAR 5:001 Section 16(8)(a)	Jurisdictional financial summary for the base and forecasted period detailing how utility derived amount of requested revenue increase;	Exhibit 27
807 KAR 5:001 Section 16(8)(b)	Jurisdictional rate base summary for the base and forecasted periods with supporting schedules which include detailed analyses of each component of the rate base;	Exhibits 28, 28 Schedule A, and 28.1 through 28.8
807 KAR 5:001 Section 16(8)(c)	Jurisdictional operating income summary for both base and forecasted periods with supporting schedules which provide breakdowns by major account group and by individual account;	Exhibits 29, 29 Schedules A through C, and 29.1 through 29.23
807 KAR 5:001 Section 16(8)(d)	Summary of jurisdictional adjustments to operating income by major account with supporting schedules for individual adjustments and jurisdictional factors;	Exhibit 30
807 KAR 5:001 Section 16(8)(e)	Jurisdictional federal and state income tax summary for both base and forecasted periods with all supporting schedules of the various components of jurisdictional income taxes;	Exhibit 29.23
807 KAR 5:001	Summary schedules for both base and forecasted periods (utility may also provide summary segregating items it proposes to recover in rates)	Exhibit 31

Section 16(8)(f)	of organization membership dues; initiation fees; expenditures for country club; charitable contributions; marketing, sales, and advertising; professional services; civic and political activities; employee parties and outings; employee gifts; and rate cases;	
807 KAR 5:001 Section 16(8)(g)	Analyses of payroll costs including schedules for wages and salaries, employees benefits, payroll taxes straight time and overtime hours, and executive compensation by title;	Exhibit 32
807 KAR 5:001 Section 16(8)(h)	Computation of gross revenue conversion factor for forecasted period;	Exhibit 34
807 KAR 5:001 Section 16(8)(i)	Comparative income statements (exclusive of dividends per share or earnings per share), revenue statistics and sales statistics for 5 calendar years prior to application filing date, base period, forecasted period, and 2 calendar years beyond forecast period	Exhibits 33, 14 and 29 Schedule A
807 KAR 5:001 Section 16(8)(j)	Cost of capital summary for both base and forecasted periods with supporting schedules providing details on each component of the capital structure;	Exhibit 35 Schedule A
807 KAR 5:001 Section 16(8)(k)	Comparative financial data and earnings measures for the 10 most recent calendar years, base period, and forecast period;	Exhibit 38
807 KAR 5:001 Section 16(8)(l)	Narrative description and explanation of all proposed tariff changes;	Exhibit 9.2
807 KAR 5:001 Section 16(8)(m)	Revenue summary for both base and forecasted periods with supporting schedules which provide detailed billing analyses for all customer classes; and	Exhibit 29 Schedule A
807 KAR 5:001 Section 16(8)(n)	Typical bill comparison under present and proposed rates for all customer classes.	Exhibit 29 Schedule A

807 KAR 5:001 Section 17(4)a	The proposed effective date and the date the proposed rates are expected to be filed with the commission	Exhibit 7
807 KAR 5:001 Section 17(4)b	The present and proposed rates for each customer class to which the proposed rates will apply.	Exhibit 7
807 KAR 5:001 Section 17(4)c	Amount of change requested in dollar amounts and percentage change for each customer classification to which change will apply.	Exhibit 7
807 KAR 5:001 Section 17(4)d	Electric, gas, water and sewer utilities - the amount of the average usage and the effect upon average bill for each customer class to which change will apply.	Exhibit 7
807 KAR 5:001 Section 17(4)e	Local exchange companies - include effect upon average bill for each customer class for change in basic local service.	Not applicable to water utilities
807 KAR 5:001 Section 17(4)	If copy of public notice included, did it meet requirements?	Exhibit 7

19. WSCK also requests Regulatory Accounting Treatment be authorized for certain costs associated with the implementation of the Oracle Fusion Enterprise Resource Planning (“ERP”) system. Details and explanation of the requested treatment is provided in the testimony of James Kilbane in Exhibit No. 9.2.

20. Pursuant to KRS 278.020(1) and 807 KAR 5:001, Section 15(2), WSCK requests a Certificate of Public Convenience and Necessity (“CPCN”) to deploy Advanced Metering Infrastructure (“AMI”) within its system. The project involves deploying AMI to one-third of the distribution system every 2 years, with the whole system being deployed over a 5-year rollout period. The initial round of AMI meter deployment is set to begin in January 2023.

21. The phased-in deployment of AMI will compress the meter replacement cycle and ensure the meters are modernized in a way that benefits customer service. Additionally, the rollout will begin in troubled locations, less accessible areas, and more dangerous areas for our meter readers within WSCK's service area.

22. In conjunction with its parent company, Corix, WSCK has selected Neptune AMI meters to be installed. Neptune meters were selected following a market analysis, Request For Information, and Request For Proposals were conducted by Corix, to select a meter vendor of choice. Neptune provides a level of product flexibility at a competitive price that meet the needs of WSCK's operating requirements. Corix was also able to negotiate a discount on nationwide pricing, providing value and annual price certainty.

23. There are many benefits to AMI, including availability of real-time consumption data, higher accuracy of readings in comparison to manual read meters, a reduction of re-readings, and an advanced ability to quickly identify unusual water usage patterns indicative of potential water leaks. In addition, WSCK customers will have constant access to their water usage.

24. The total estimated capital cost for the AMI project is \$1,696,462. The costs impacts estimated to be produced by the AMI project are shown in Exhibit 41.

25. The Company plans to finance the AMI project with funds provided by CRU's capital structure, which is consistent with how all capital investments are funded for WSCK.

26. The Commission has recently approved a similar-sized project for South Eastern Water Association. In Case No. 2021-00222, the Commission granted a CPCN for AMI deployment of approximately 8,000 meters with an approximate estimated cost of \$304.56 per meter. WSCK's estimated cost per meter for its project is \$257.70.

27. These advantages of AMI, project plans, and anticipated costs are further described in testimonies of Colby Wilson and James Kilbane and corresponding exhibits.

28. In further support of its application for a Certificate of Public Convenience and Necessity, WSCK attaches the following required documents or explains their absence:

<b>Filing Requirements</b>	<b>Abbreviated Requirement Description</b>	<b>Location or Absence Reason</b>
807 KAR 5:001 Section 15(2)	Upon application for a certificate that the present or future public convenience or necessity requires, or will require, the construction or extension of any plant, equipment, property, or facility, the applicant, in addition to complying with Section 14 of this administrative regulation, shall submit with its application:	See below
807 KAR 5:001 Section 15(2)(a)	The facts relied upon to show that the proposed construction or extension is or will be required by public convenience or necessity.	Exhibits 9.1 and 9.7
807 KAR 5:001 Section 15(2)(b)	Copies of franchises or permits, if any, from the proper public authority for the proposed construction or extension, if not previously filed with the commission.	Not applicable – no franchises or permits required for deployment
807 KAR 5:001 Section 15(2)(c)	A full description of the proposed location, route, or routes of the proposed construction or extension, including a description of the manner in which same will be constructed, and the names of all public utilities, corporations, or persons with whom the proposed construction or extension is likely to compete.	Exhibits 39 and 9.7
807 KAR 5:001 Section 15(2)(d)1	Three (3) copies (one (1) in portable document format on electronic storage medium and two (2) in paper medium) of maps to suitable scale showing the location or route of the proposed construction or extension, as well as the location to scale of like facilities owned by others located anywhere within the map area with adequate identification as to the ownership of the other facilities.	Exhibit 39



807 KAR 5:001 Section 15(2)(d)2	Plans and specifications and drawings of the proposed plant, equipment, and facilities.	Exhibit 40
807 KAR 5:001 Section 15(2)(e)	The manner in detail in which the applicant proposes to finance the proposed construction or extension.	Exhibit 9.2
807 KAR 5:001 Section 15(2)(f)	An estimated annual cost of operation after the proposed facilities are placed into service.	Exhibit 41
KRS 322.340	Engineering plans, specifications, drawings, plats and reports for the proposed construction or extension prepared by a registered engineer, must be signed, sealed, and dated by an engineer registered in Kentucky.	Not applicable – no engineering required for deployment

WSCK requests that the Commission approve the proposed rate adjustments, grant a certificate of public convenience and necessity to deploy advanced metering infrastructure, and grant approval of a regulatory asset as described above. It also requests a deviation pursuant to 807 KAR 5:001, Section 22, from any requirement that might delay the review of the application if such requirement can be considered as substantially met or as unnecessary for a complete review of the proposed rates.

Respectfully submitted,  
STURGILL, TURNER, BARKER & MOLONEY, PLLC




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