

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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**MOTION FOR LEAVE TO FILE  
UPDATED EVIDENCE OF RATE CASE EXPENSE**

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Water Service Corporation of Kentucky (“WSCK”), by counsel, moves the Public Service Commission of Kentucky (the “Commission”), for leave to file updated evidence of rate case expenses. In support of this request, WSCK states as follows:

In Item 12 of the Commission Staff’s first request for information, Staff requested information associated with WSCK’s rate-case expenses. Staff also requested that WSCK provide a monthly update. WSCK submitted its initial response in July 2022 and provided regular monthly updates through November 2022. WSCK also provided updated schedules and invoices on December 9, 2022—the date on which responses to post-hearing data requests were due.

On December 13, 2022, WSCK received an additional invoice from third-party consultants for rate case expenses related to the testimony associated with return on equity and the wage and salary study. Those two invoices are attached. WSCK is also contemporaneously filing an update to the Excel file titled “PSC 1-12 Rate Case Expense.”

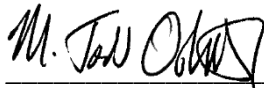
WSCK respectfully requests the Commission accept this evidence as it relates to WSCK’s request to recover rate-case expense. Although WSCK acknowledges that this evidence is being

filed two business days after the deadline for post-hearing data responses, it notes that there is no specific deadline for submission of the monthly update requested by Staff. In addition, the evidence being submitted is narrow in scope, and WSCK believes that there is sufficient time for the intervening parties to address arguments, if any, in the legal briefs due on December 16 and 27. In addition, WSCK notes that it is filing the evidence on the same day it was received by the Company.

WHEREFORE, WSCK respectfully requests that the Commission accept this documentation into evidence for consideration in this matter.

RESPECTFULLY SUBMITTED,

STURGILL, TURNER, BARKER & MOLONEY, PLLC



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M. Todd Osterloh

Rebecca C. Price

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*Counsel for Water Service Corporation of Kentucky*



Smart. Focused. Done Right.

ScottMadden, Inc.  
2626 Glenwood Avenue  
Suite 480  
Raleigh, NC 27608  
919-781-4191  
scottmadden.com

December 13, 2022

Invoice Number: 021995

PO Number:

Accounts Payable  
Water Service Corporation of Kentucky  
500 W. Monroe Street  
Suite 3600  
Chicago, IL 60661

In Reference To: Professional services provided in November 2022 for project 197-003  
WSK Rate of Return Study

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	<i>Amount</i>
<b>Professional Fees</b>	\$ 18,748.75
<b>Expenses</b>	
Travel and Living Expenses	\$ 1,213.49
<b>Total Fees and Expenses</b>	<u>\$ 19,962.24</u>
<b>Total Due</b>	<u>\$ 19,962.24</u>

If you have any questions regarding this invoice, please let me know. Please remit payment in U.S. funds to: ScottMadden, PO Box 935955, Atlanta, GA 31193-5955. Thank you for retaining ScottMadden.

Sincerely,

Dylan D'Ascendis  
Partner

ScottMadden, Inc.  
Tax ID:



Project

WSK Rate of Return Study

In Reference to:

Professional services provided in November 2022 for project 197-003

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		<u>Current</u>	<u>Rate</u>	<u>Current</u>
		<u>Hours</u>		<u>Amount</u>
<b>Professional Fees</b>				
<b>Dylan D'Ascendis</b>	11/2/2022	1.00	325.00	325.00
Conference call				
<b>Dylan D'Ascendis</b>	11/9/2022	1.00	325.00	325.00
Reviewed opposing testimony				
<b>Dylan D'Ascendis</b>	11/13/2022	2.50	325.00	812.50
Rebuttal testimony				
<b>Dylan D'Ascendis</b>	11/16/2022	0.50	325.00	162.50
Conference call				
<b>Dylan D'Ascendis</b>	11/17/2022	5.50	325.00	1,787.50
Rebuttal testimony				
<b>Dylan D'Ascendis</b>	11/18/2022	2.00	325.00	650.00
Rebuttal testimony				
<b>Dylan D'Ascendis</b>	11/20/2022	1.50	325.00	487.50
Rebuttal testimony				
<b>Dylan D'Ascendis</b>	11/23/2022	0.50	325.00	162.50
Conference call				
<b>Dylan D'Ascendis</b>	11/26/2022	0.50	325.00	162.50
Hearing prep				
<b>Dylan D'Ascendis</b>	11/29/2022	8.00	325.00	2,600.00
Hearing prep and travel				
<b>Dylan D'Ascendis</b>	11/30/2022	17.00	325.00	5,525.00
Hearing attendance and travel				
<b>Sara Derstine</b>	11/18/2022	4.00	65.00	260.00
Proofread and formatted rebuttal testimony				
<b>Sara Derstine</b>	11/21/2022	0.75	65.00	48.75
Organized hearing prep materials				
<b>Sara Derstine</b>	11/22/2022	1.50	65.00	97.50
Organized hearing prep materials				
<b>Sara Derstine</b>	11/23/2022	0.50	65.00	32.50
Organized hearing prep materials				
<b>John Semenza</b>	11/7/2022	2.00	125.00	250.00

Project	WSK Rate of Return Study			
Rebuttal Analysis				
<b>Daria Pichugina</b>	11/14/2022	2.00	150.00	300.00
Rebuttal Analysis				
<b>Daria Pichugina</b>	11/15/2022	2.00	150.00	300.00
Rebuttal Analysis				
<b>Nicole Stark</b>	11/2/2022	5.00	125.00	625.00
Auditing and creating analyses.				
<b>Nicole Stark</b>	11/4/2022	4.00	125.00	500.00
Auditing analyses.				
<b>Ryan Kucan</b>	11/14/2022	6.50	230.00	1,495.00
Rebuttal Testimony				
<b>Ryan Kucan</b>	11/15/2022	8.00	230.00	1,840.00
Rebuttal Testimony				
	Professional Fees		76.25	18,748.75

# ScottMadden, Inc.

## Expense Detail

Client Name: Corix Group of Companies (US)

Invoice #: 021995

Project: 197-003- WSK Rate of Return Study

546 Dylan D'Ascendis

Billable Expenses:

			<u>Units</u>	<u>Rate</u>	<u>Amount</u>
11/27/2022	Dylan D'Ascendis	Airfare	0.00	0.000	\$792.95
11/29/2022	Dylan D'Ascendis	Hotel Tax	0.00	0.000	\$20.00
11/29/2022	Dylan D'Ascendis	Taxi	0.00	0.000	\$23.99
11/29/2022	Dylan D'Ascendis	Actual Meals	0.00	0.000	\$54.31
11/29/2022	Dylan D'Ascendis	Hotel	0.00	0.000	\$149.00
11/30/2022	Dylan D'Ascendis	Taxi	0.00	0.000	\$43.91
11/30/2022	Dylan D'Ascendis	Actual Meals	0.00	0.000	\$129.33

Total Billable Expenses:

\$1,213.49

\$1,213.49



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ScottMadden, Inc.  
2626 Glenwood Avenue  
Suite 480  
Raleigh, NC 27608  
919-781-4191  
scottmadden.com

December 13, 2022

Invoice Number: 021998

PO Number: P91-2210-100186

Accounts Payable  
Water Service Corporation of Kentucky  
500 W. Monroe Street  
Suite 3600  
Chicago, IL 60661

In Reference To: Professional services provided in November 2022 for project 197-004  
WSK Wage and Benefit Study

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	<i>Amount</i>
<b>Professional Fees</b>	\$ 7,290.00
<b>Expenses</b>	
Travel and Living Expenses	\$ 454.85
<b>Total Fees and Expenses</b>	<u>\$ 7,744.85</u>
<b>Total Due</b>	<u><u>\$ 7,744.85</u></u>

If you have any questions regarding this invoice, please let me know. Please remit payment in U.S. funds to: ScottMadden, PO Box 935955, Atlanta, GA 31193-5955. Thank you for retaining ScottMadden.

Sincerely,

Dylan D'Ascendis  
Partner

ScottMadden, Inc.  
Tax ID



Project WSK Wage and Benefit Study  
 In Reference to: Professional services provided in November 2022 for project 197-004

		Current		Current
		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Professional Fees</b>				
<b>Quentin Watkins</b>	11/21/2022	1.00	270.00	270.00
Discussed approach to rebuttal testimony and began drafting response				
<b>Quentin Watkins</b>	11/22/2022	2.00	270.00	540.00
Drafted rebuttal testimony to respond to OAG direct testimony				
<b>Quentin Watkins</b>	11/28/2022	2.00	270.00	540.00
Prepared notes and responses for cross examination on 11/30				
<b>Quentin Watkins</b>	11/29/2022	4.00	270.00	1,080.00
Prepared notes and responses for cross examination on 11/30				
<b>Quentin Watkins</b>	11/29/2022	8.00	270.00	2,160.00
Travel to hearings				
<b>Quentin Watkins</b>	11/30/2022	2.00	270.00	540.00
Took the stand at KY PSC to respond to questions about my testimony				
<b>Quentin Watkins</b>	11/30/2022	8.00	270.00	2,160.00
Travel from hearings				
		<hr/>		
Professional Fees		27.00		7,290.00



# ScottMadden, Inc.

## Expense Detail

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**Client Name:** Corix Group of Companies (US) **Invoice #:** 021998  
**Project:** 197-004- WSK Wage and Benefit Study

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295 Quentin Watkins

Billable Expenses:

			<u>Units</u>	<u>Rate</u>	<u>Amount</u>
11/29/2022	Quentin Watkins	Hotel Tax	0.00	0.000	\$20.52
11/29/2022	Quentin Watkins	Actual Meals	0.00	0.000	\$21.89
11/29/2022	Quentin Watkins	Hotel	0.00	0.000	\$166.00
11/30/2022	Quentin Watkins	Fuel	0.00	0.000	\$24.54
11/30/2022	Quentin Watkins	Fuel	0.00	0.000	\$26.26
11/30/2022	Quentin Watkins	Parking	0.00	0.000	\$34.00
11/30/2022	Quentin Watkins	Car Rental	0.00	0.000	\$161.64

Total Billable Expenses: \$454.85  
\$454.85