

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NORTHERN KENTUCKY)
WATER DISTRICT FOR AN ADJUSTMENT OF RATES;) **CASE NO. 2022-00161**
ISSUANCE OF BONDS; FINANCING; AND TARIFF REVISIONS)

MOTION TO ALLOW VIRTUAL EXAMINATION OF WITNESS
CONSTANCE HEPPENSTALL, PROJECT MANAGER FOR GANNETT FLEMING
VALUATION AND RATE CONSULTANTS, LLC

Comes now the Northern Kentucky Water District (“NKWD”), by and through counsel, pursuant to 807 KAR 5:001, Section 9, and other applicable law, and moves the Kentucky Public Service Commission (“Commission”) to allow for the virtual examination of witness Constance Heppenstall (“Ms. Heppenstall”), Project Manager for Gannett Fleming Valuation and Rate Consultants, LLC.

In support of this motion, NKWD states that its application was filed on July 22, 2022 and no party has intervened. Ms. Heppenstall conducted the Cost-of-Service Allocation and Rate Design Study for NKWD which was submitted as Exhibit N of NKWD’s Application. Ms. Heppenstall also provided prefiled testimony which was included as Exhibit Q5 of NKWD’s Application.

As a Project Manager for Gannett Fleming Valuation and Rate Consultants, LLC, Ms. Heppenstall’s primary place of business is in Audubon, Pennsylvania and due to other work commitments will be unable to attend the scheduled hearing on October 26, 2022. However, Ms. Heppenstall can be made available if necessary to testify virtually.

In light of the foregoing, NKWD moves the Commission to allow for Ms. Heppenstall to testify virtually if her testimony is required. Granting the motion will save considerable expense for NKWD without impairing the ability of the Commission, or Staff to engage in meaningful cross-examination of the witness.

For the aforementioned reasons herein, NKWD respectfully request the Commission grant NKWD's motion to allow for the virtual examination of witness Constance Heppenstall.

Respectfully submitted,

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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on October 6, 2022 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

Tom Edge, Esq. (KBA #95534)