

**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 FOR DECISION ON THE RECORD AND WAIVER OF HEARING**

Comes now the Northern Kentucky Water District (“NKWD”), by and through counsel and hereby moves the Public Service Commission (“Commission”) for a decision on the record in this matter.

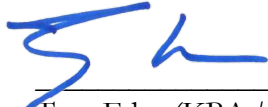
In support of this motion, NKWD states that its application was filed on July 22, 2022 and no party has intervened. NKWD has responded to three extensive Request for Information from Commission Staff and have submitted over 2,900 pages of documents in support of this matter.

The issues in this case appear to be similar to those raised in NKWD’s recent prior applications: Financing of long-term debt for capital construction and recovery of known and measurable pro forma adjustments. Given the thoroughness of the Commission Staff’s Request for Information, NKWD’s responses, and the similarity of issues from prior cases, NKWD believes the record is adequate for purposes of reviewing, evaluating and deciding the proposed adjustments. Moreover, the lack of intervenors suggests that the application has not created concern among NKWD’s customer base.

Elimination of the evidentiary hearing will save both NKWD and the Commission time, effort, and expense. Given the Commission's current workload and schedule, avoiding the preparation for and the presence at a hearing will be an efficient use of limited resources. There is precedent for such action; the Commission granted a similar motion to issue an order based on the case record without a hearing through a January 25, 2019 Order in Case No 2018-00129, In the Matter of: *Application of Inter County Energy Cooperative Corporation for and Adjustment of Existing Rates*.

For the aforementioned reasons herein, NKWD respectfully request the Commission GRANT NKWD's motion for a decision on the record.

Respectfully submitted,

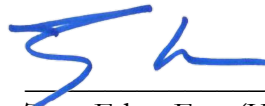


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#### **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on October 12, 2022 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.



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Tom Edge, Esq. (KBA #95534)