

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>ELECTRONIC TARIFF FILING OF THE CITY OF</b>	}
<b>BURKESVILLE TO INCREASE ITS WHOLESALE</b>	}
<b>RATE TO CUMBERLAND COUNTY WATER</b>	} <b>CASE NO.</b>
<b>DISTRICT</b>	} <b>2024-00075</b>
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**RESPONSE TO ORDER**  
**&**  
**MOTION TO RECONSIDER WITH**  
**NOTICE OF SUPPLEMENT TO RECORD**  
**&**  
**MOTION FOR EXTENSION OF TIME**

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Comes now **CITY OF BURKESVILLE** (hereinafter “City”) in Response to Order entered September 12, 2024, regarding the wholesale water service to Cumberland Conty Water District (Cumberland District) effective April 15, 2024 and hereby re-asserts that the Contract was negotiated in good faith and by two parties represented by Counsel and further moves the Commission to reconsider its findings. Further, and in light of this Motion, pursuant to paragraph (3), the Commission Ordered that Burkesville file “within twenty (20) days of the date of service of the Order, new tariff sheets setting forth the rate and charge approved by this Order and it’s effective date, and also stating that the rate and charge were authorized by this Order” 9-12-2024 Order, Public Service Commission, the City hereby timely requests an extension of the September 14, 2024 Order deadlines until a certain date of November 1, 2024 while the Court reviews and

considers this Motion and the supplementation of the record attached hereto as well as to gather more information from the Cumberland County Water District's and from the Consultant with the Kentucky Rural Water Association.

In support thereof, the City would re-state that this Contract was negotiated in good faith between two competent parties who were represented by legal counsel and both Parties consulted with Robert Miller from the Kentucky Rural Water Association who guided each party through the logistics of the "Phase in" plan. Further, both parties agreed that a gradual rate increase over a three (3) year period would be in the best interest of the consumer to prevent a rate shock to the consumer and while the City of Burkesville agreed to absorb a "short-term short fall" due to the phased in approach, the intention behind the proposed \$3.26 per 1,000 gallons of water was for the City of Burkesville to recover on the third year from the shortfall on the first and second year. The City of Burkesville would further state that without approval of the \$3.26 rate on the third year, the City will forego the revenue which was the basis for the negotiation. Additionally, the denial of the third phase could result in a breakdown of the good relationship currently enjoyed between the City of Burkesville and the Cumberland County Water District. The City would cite that the above as good cause shown for the extension, and assert that no party will be prejudiced by the *de minimums* extension of time.

**WHEREFORE**, the undersigned requests the relief above requested.

Respectfully Submitted,

BY: /s/Holly Long Parrigin  
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BURKESVILLE, KENTUCKY 42717  
*Attorney for the City Burkesville*

**CERTIFICATE OF SERVICE**

The foregoing was served by electronic filing this 26<sup>th</sup> day of September 2024.

*/s/ Holly Long Parrigin*

**HON. HOLLY LONG PARRIGIN**