

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**RE: ELECTRONIC TARIFF FILING OF THE CITY OF
AUGUSTA TO INCREASE THE WHOLESALE
WATER RATE CHARGED TO BRACKEN
COUNTY WATER DISTRICT**

**INTERVENOR, BRACKEN COUNTY WATER DISTRICT’S (BCWD’S) REQUEST FOR
THE KY PSC TO RULE ON THE REQUEST OF THE CITY OF AUGUSTA TO AMEND ITS RATE
INCREASE REQUEST AMOUNT, AND TO INDEFINITELY SUSPEND THE RATE INCREASE
EFFECTIVE DATE UNTIL THE CITY OF AUGUSTA PERFECTS ITS AMENDMENT REQUEST**

CASE NUMBER 2024-00349

Comes now the intervening party, Bracken County Water District, (“BCWD”), by and through counsel, Mr. Jesse P. Melcher, Esq., and hereby files a Motion for the Kentucky Public Service Commission to acknowledge the request of the City of Augusta to amend its request for a water purchase increase, of \$2.96 per 1000 gallons to \$3.20 per 1000 gallons, and to indefinitely suspend the effective date of its current rate increase request or to dismiss the current rate increase and for City of Augusta to file its new request after appropriate notice, KRS 278.190, and new tariff filing.

The City of Augusta requested a rate increase of \$2.96 per 1000 gallons to go into effect on December 1, 2024, wherein, by Order of KY PSC, on November 19, 2024, the rate was suspended pursuant to KRS 278.190, for five months subject to 6 months.

The City of Augusta, then in its filing of alleged rebuttal testimony, asserted by notarized statement of the Mayor of Augusta, i.e., John Laycock, requested to increase its wholesale water request from \$2.96 per 1000 gallons to \$3.20. (*see. response of City of Augusta, Affidavit of Mayor John Laycock, filed March 19, 2025*). BCWD believes this constitutes a request for amendment of its wholesale water rate case, and requests the Commission (KY PSC) to rule on the request to amend the wholesale water rate by City of Augusta, and to establish by Order of the Commission to indefinitely suspend the rate increase request, and to establish upon Order of KY PSC Commission, that the rate increase amendment go through the appropriate method of rate increase amendment (i.e. City of Augusta, City Council approval, formal notice of wholesale water rate increase to the new amount requested, appropriate advertisement, and appropriate amended tariff filing) or alternatively to dismiss this rate increase request and for the City of Augusta to file an amended tariff for the new rate.

Respectfully submitted,

/s/ JESSE P. MELCHER, ESQ.
BRACKEN COUNTY WATER DISTRICT,
ATTORNEY
JESSE MELCHER LAW OFFICE, PLLC
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CERTIFICATE OF SERVICE

I, Jesse P. Melcher, Esq. as counsel and representative of BCWD herein, do hereby certify that I have mailed out by electronic filing through the KY PSC web portal, pursuant to 807 KAR 5:001(8), this the 26th day of March, 2025; and that no party herein, has opted out of the electronic notice and/or filing herein, and proof of electronic filing and courtesy copy are as follows, of BCWD's responses to City of Augusta's questions:

KY PSC, filed by web portal in this case number

Ms. Cynthia Thompson, Esq.
Counsel for City of Augusta
ccthompsonatty@yahoo.com

Courtesy Copy by mail, U.S.P.S.
City of Augusta
Attn: Cynthia Thompson, Esq.
219 Main Street
P.O. Box 85
Augusta, KY 41002

/s/ MR. JESSE P. MELCHER, ESQ.