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179 Old Bridge Rd
Danville, KY 40422
December 11, 2017

DEC 12 2017
PUBLIC SERVICE
COMMISSION

Commissioner Talina R. Mathews
Public Service Commission
PO Box 615
Frankfort, KY 40602

RE: case 2017-00343

Dear Commissioner Mathews,

I wanted to call your attention to the sizeable rate increase (72.98% on an "average" bill) requested by Commercial Propane Service, LLC DBA Bright's Propane Service, Inc. the details of which can be found in the attached document.


Proposed rates for the first 400 cubic feet will increase by 63.87% and over 400 cubic feet will increase 63.88%. These are unrealistically large increases and require your immediate attention. Additionally, Commercial Propane Service has requested a litany of NEW fees that shift the cost of maintenance to their customers – see Meter Testing charge, Service Investigation charge, and Service Assignment charge. Increases of 600% for disconnect and reconnect seem wholly unjustifiable.

Commercial Propane Service will also require a deposit however the notice does not indicate if the deposit will be required of current customers and new customers with good credit ratings. Nor does the notice indicate interest that will be paid on the deposit.

807 KAR 5:076 Alternative rate adjustment procedure for small utilities, Section 9 Test Period states "The reasonableness of the proposed rates shall be determined using a twelve (12) month historical test period, adjusted for known and measureable changes, that coincides with the reporting period of the applicant's annual report for the immediate past year." Can you confirm that the proposed rate and fee changes and additions are indeed reasonable? May I review the supporting documentation for myself?

Thank you, in advance, for your attention to this matter.

Yours truly,



Mary Beth Touchstone

Attachment

NOTICE

Because of increased operating expenses, Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc. will file on or about December 6, 2017 an application with the Kentucky Public Service Commission for the purpose of adjusting its rates. The application will be filed pursuant to the procedures set forth in 807 KAR 5:076. Under those procedures, the proposed rates may not be placed into effect until the Public Service Commission has issued an order approving the proposed rates or six (6) months from the date of the filing of the application, whichever occurs first. Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc. acquired Heritage Operating, LP d/b/a Bright's Propane Service, Inc. in 2014 and has never requested a general rate adjustment.

Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc. proposes the following rates:

	Present Rate	Proposed Rate	Change (\$)	Change (%)
First 400 Cubic Ft	\$ 18.21 Minimum Bill	\$ 29.84 Minimum Bill	\$11.63	63.87
Over 400 Cubic Ft	0.04552 Per Cubic Ft	0.07460 Per Cubic Ft	\$0.02908	63.88
Meter Replacement Surcharge	N/A	\$ 5.42 per Month	\$5.42	N/A

The proposed rates will have the following effect on a customer's monthly bill:

Meter	Average Monthly Usage	Current Monthly Bill	Proposed Rates Monthly Bill	Increase (\$)	Change (%)
All	1,305 Cu. Ft.	\$59.41	\$102.77	\$43.36	72.98

Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc. has also reviewed the charges and fees assessed for non-recurring services. These charges and fees have never been revised by Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc. It proposes to adjust or implement the following fees and charges to reflect the current cost of providing service:

	Present Rate	Proposed Rate	Change (\$)	Change (%)
Tap-In Fee	\$275.00	Actual	N/A	N/A
Disconnection Charge	15.00	105.00	90.00	600
Reconnection Charge	15.00	105.00	90.00	600
Late Payment Charge	7.50	10%	N/A	N/A
Returned Payment Fee	0.00	30.00	30.00	N/A
Meter Testing Charge	0.00	135.00	135.00	N/A
Meter Relocation Charge	0.00	Actual	N/A	N/A
Service Investigation Charge	0.00	95.00	95.00	N/A
Service Assignment or Transfer Charge	0.00	30.00	30.00	N/A
Deposit	0.00	160.00	160.00	N/A

The rates contained in this notice are the rates proposed by Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc. However, the Public Service Commission may order rates to be charged that differ from these proposed rates. Such action may result in rates for consumers other than the rates in this notice.

Any person may examine the application submitted to the Public Service Commission at Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc.'s office at 160 Sulphur Springs Road, Lebanon, Kentucky 40033 or at the Public Service Commission's offices located at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8:00 a.m. to 4:30 p.m., or through the Public Service Commission's Web site at <http://psc.ky.gov>.

Comments regarding the application may be submitted to the Public Service Commission through the Commission's Web Site at <http://psc.ky.gov> or by mail to the Public Service Commission, P.O. Box 615, Frankfort, Kentucky 40602.

A person may submit a timely written request for intervention to the Public Service Commission, P.O. Box 615, Frankfort, Kentucky 40602, establishing the grounds for the request including the person's status and interest. If the Public Service Commission does not receive a written request for intervention within thirty (30) days of the initial publication of notice, it may take final action on the application

Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc.
Mailed: December 6, 2017