

AUG 12 2019

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE)	
WATER SERVICE RATES OF CENTRAL CITY)	Case No. 2019-00260
MUNICIPAL WATER & SEWER)	

**MOTION TO ACCEPT THE FILING OF THE PROPOSED TARIFF ON
RATE CASE SURCHARGE AND INCORPORATE INTO THIS CASE RECORD**

The City of Central City, by counsel, respectfully requests that the Public Service Commission accepts the filing of the proposed tariff related to a rate case expense surcharge and incorporates the issue of its reasonableness into the record of this case. The proposed tariff is attached to this motion.

Central City has proposed to increase its volumetric rate of \$3.31 per 1,000 gallons. That amount is based on a letter of conditions issued by U.S.D.A.'s Rural Development, and would not have contemplated rate case expenses incurred in this case. Accordingly, Central City proposes a rate case expense surcharge to recover its total amount of rate case expense incurred as a result of this proceeding. Central City proposes to recover these rate case expenses over a thirty-six month period, which is consistent with prior Commission decisions.

Central City also proposes that this surcharge be effective on the date that the Commission issues its final order in this matter and no earlier than 30 days after the date of the filing of this motion. It will file supporting documentation in the record of this case, as requested by the Commission in the Commission's initial request for information.

To the extent necessary, Central City requests deviation from the procedures identified in 807 KAR 5:011 pertaining to the filing of tariffs. For example, Section 2 requires utilities' proposed tariffs to be filed electronically with the Electronic Tariff Filing System. It appears that this is unnecessary because the surcharge should be considered in the context of this case, and it is more appropriate for this proposed tariff to be filed in this matter rather than the Electronic Tariff Filing System. Section 8 requires utilities to provide notice of the proposed rates to customers by certain methods. Because the surcharged proposed by Central City is being filed in this case and being served on counsel for both of Central City's impacted customers, the water districts have knowledge of the filing. It is not necessary for Central City to provide further notice of this proposed surcharge.

For the reasons stated above, Central City requests that the Commission that the Commission accepts the filing of the proposed tariff related to a rate case expense surcharge and incorporate the issue of its reasonableness of that proposed surcharge into the record of this case

Respectfully submitted,



M. TODD OSTERLOH
JAMES W. GARDNER
STURGILL, TURNER, BARKER & MOLONEY, PLLC
333 W. Vine Street, Suite 1500
Lexington, Kentucky 40507
Telephone No.: (859) 255-8581
tosterloh@sturgillturner.com

ATTORNEYS FOR CITY OF CENTRAL CITY

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, I certify that this document has been served on counsel for Muhlenberg County Water District and Muhlenberg County Water District No. 3 electronically and via U.S. Postal Service on August 9, 2019.

Honorable Damon R Talley
Attorney at Law
Stoll Keenon Ogden PLLC
P.O. Box 150
Hodgenville, KENTUCKY 42748



Counsel for Central City

FOR Service to PSC Regulated Utilities
Community, Town or City

P.S.C. KY. NO. _____

1st SHEET NO. 2

City of Central City
(Name of Utility or City)

CONTENTS

RATE CASE EXPENSE SURCHARGE

Monthly Surcharge

Muhlenberg County Water District: \$1,250 per month* (N)

Muhlenberg County Water District No. 3 \$1,250 per month* (N)

* Central City proposes a surcharge to recover all expenses it may incur to participate in and defend its proposed rates in Case No. 2019-00260 before the Public Service Commission. Central City proposes to recover the total amount of expenses associated with the increase in rates over a 36-month period. The surcharge will expire 36 months after its effective date.

DATE OF ISSUE August 9, 2019
Month / Date / Year

DATE EFFECTIVE _____
Month / Date / Year

ISSUED BY David Rhoades



TITLE City Administrator

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION

IN CASE NO. _____ DATED _____