

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
SOUTHERN WATER AND SEWER	)	
DISTRICT FOR AN ALTERNATIVE	)	CASE NO. 2018-00230
RATE ADJUSTMENT	)	

**ATTORNEY GENERAL'S MOTION FOR LEAVE TO SUPPLEMENT HIS POST-HEARING BRIEF, OR IN THE ALTERNATIVE FOR THE COMMISSION TO INITIATE AN INVESTIGATION**

Comes now the Attorney General of the Commonwealth of Kentucky (the “Attorney General”), by and through his Office of Rate Intervention, and hereby moves the Commission for leave to supplement his Post-Hearing Brief, or that the Public Service Commission (the “Commission”) alternatively open an investigation into the management and operation of the Southern Water and Sewer District (the “District”). If support of his motion, the Attorney General states as follows:

On January 28, 2019, after the close of evidence, which included an evidentiary hearing over two days, and following the submission of all post-hearing briefs, some 67 pages of documents were uploaded to the case file as “David Layne Response.” The documents were submitted by Mr. Layne, the Floyd County Fiscal Court Treasurer. Upon initial review of the documents, the Attorney General believes that they have a direct impact upon ratepayers’ interests in this matter, and that he should have an opportunity to address this new evidence in a supplement to his post-hearing brief. In the alternative, the Commission should immediately initiate an investigation into the management and operations of the District,

including but not limited to the Asset Purchase Agreement previously approved in Case No. 2017-00044, and the ongoing issues related to it.

**WHEREFORE**, the Attorney General requests that the Commission, grant his request for leave to supplement his Post-Hearing Brief or, alternatively, to open an investigation into the management and operations of the District.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



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