COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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IN THE MATTER OF:

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR ENFORCEMENT OF RATE AND SERVICE STANDARDS

CASE NO. 2019-00269

MOTION TO AMEND EXHIBITS OF CITY OF HENDERSON, KENTUCKY AND HENDERSON UTILITY COMMISSION, d/b/a HENDERSN MUNICIPAL POWER & LIGHT

Pursuant to 807 KAR 5:001, Section 4(5) and 5, the City of Henderson, Kentucky and Henderson Utility Commission d/b/a Henderson Municipal Power & Light (jointly "Henderson") hereby moves the Kentucky Public Service Commission for leave to amend the Direct Testimony of Barbara Moll and Exhibits Moll-3 and Moll-4 which were filed on July 14, 2020, in the abovecaptioned proceeding. The purpose of the amendments is to provide a recalculation of the amount due from Big Rivers to Henderson in settlement of the FY 2018-2019 budget. Exhibit Moll-3 and Exhibit Moll-4 are amended to correct the amount due from Big Rivers to Henderson as a result of the improper capacity reservation from \$561,622 to \$454,090. The testimony and exhibits are further amended to revise the final amount due from Big Rivers to Henderson from \$6,359,736 to \$6,252,304. Henderson respectfully requests that the Commission permit Amended Direct Testimony of Barbara Moll and Amended Exhibits Moll-3 and Moll-4, included as attachments to this Motion, to be filed of record in this proceeding. Respectfully submitted,

/s/ John N. Hughes

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and

/s/ H. Randall Redding H. RANDALL REDDING SHARON W. FARMER KING, DEEP & BRANAMAN 127 North Main Street P.O. Box 43 Henderson, Kentucky 42419-0043 Telephone: (270) 827-1852 rredding@kdblaw.com sfarmer@kdblaw.com

Attorneys for Henderson Utility Commission, d/b/a Henderson Municipal Power & Light

/s/ Dawn Kelsey DAWN KELSEY CITY ATTORNEY CITY OF HENDERSON 222 First Street Henderson, Kentucky 42420 *Attorney for City of Henderson*

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was forwarded this 15th day of October, 2020, via U.S. Mail, postage prepaid, or via facsimile, electronic mail, and/or hand delivery, to the following:

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Jody Kyler Cohn, Esq. BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202

Tyson Kamuf, Esq. BIG RIVERS ELECTRIC CORPORATION 201 Third Street, P.O. Box 727 Henderson, KY 42419-0024

Attorneys for Big Rivers Electric Corp.

Original to:

Ms. Gwen R. Pinson Executive Director Kentucky Public Service Commission 211 Sower Boulevard, P.O. Box 615 Frankfort, KY 40602-0615

/s/ H. Randall Redding