

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

ELECTRONICALLY FILED

In the Matter of:

ELECTRONIC TARIFF FILING OF TAYLOR)	
COUNTY RURAL ELECTRIC COOPERTIVE)	CASE NO.
CORPORATION TO IMPLEMENT A PREPAY)	2020-00036
METERING PROGRAM)	

MOTION TO WITHDRAW APPLICATION

Taylor County Rural Electric Cooperative Corporation, acting by the undersigned counsel, now moves the Commission to permit it to withdraw the tariff filing made herein, the purpose of such tariff filing being to implement a PrePay Metering Program. As grounds for and in support of the foregoing Motion, Taylor County's undersigned counsel advises the Commission as follows:

1. The within tariff filing, which undertakes to describe a voluntary program by means of which Taylor County's members may select a payment option not currently available to them, was generated internally by Taylor County's staff and, upon completion, was forwarded to the Commission on or about January 30, 2020, without the assistance of counsel. Accordingly, the undersigned counsel's first notice of this proceeding was provided by the Commission's Order entered herein on February 21, 2020.
2. Upon being apprised of this proceeding before the Commission, the undersigned counsel has undertaken, with the assistance of Taylor County's

staff and management, to carefully examine the methodology employed in attempting to create a PrePay Metering Program which, as this proceeding confirms, necessarily becomes the subject of the Commission's review for reasonableness. Counsel and management have thus concluded that, although the proposed PrePay Metering Program is desirable in that it will, upon implementation, provide a benefit to certain of Taylor County's membership, the creation and verification of background information sufficient to satisfy the Commission's inquiry into this matter is incomplete. Counsel is further of the opinion that assimilation of appropriate background information supporting this Program as advanced may or will require the services of an outside consultant, and Taylor County thus deems it improvident to move forward with this application until such time as its preparation is both complete and adequate.

3. Taylor County apologizes to the Commission for having caused the Commission to initiate this proceeding, and assures the Commission that it intends to go forward with the development of its PrePay Metering Program and will again present that program for the Commission's approval at such time as the justification and reasonableness of same can be properly presented.

/s/ Robert Spragens, Jr.
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