COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PURCHASED WATER)
ADJUSTMENT FILING OF LETCHER) CASE NO. 2020-00037
COUNTY WATER AND SEWER DISTRICT)

MOTION FOR LEAVE TO AMEND APPLICATION

Pursuant to 807 KAR 5:001, Section 4(5), Letcher County Water and Sewer District moves for leave to amend its Application for a Purchased Water Adjustment and for an order from the Commission that this amendment relate back to the date of the original application. In support of its Motion, Letcher County Water and Sewer District states:

- 1. On February 26, 2020, Letcher County Water and Sewer District filed its Application for Purchased Water Adjustment to revise its rates to reflect the increased purchased water expense related to the recent increase in its wholesale supplier's rates.
- 2. In its Application, Letcher County Water and Sewer District incorrectly stated its sales for the 12-month period ending December 31, 2019. This error resulted in the incorrect calculation of the purchase water adjustment factor.
- 3. Letcher County Water and Sewer District discovered this error on March 6, 2020 and immediately notified Commission Staff.
- 4. Letcher County Water and Sewer District has revised its application to reflect the correct amount of sales for the 12-month period ending December 31, 2019 and has recalculated the purchased water adjustment factor. The amended application is attached to this Motion.
- 5. Letcher County Water and Sewer District's Board of Commissioners has met and adopted a resolution correcting the rates authorized on February 20, 2020 and relating this correction back to February 20, 2020.

6. The corrected rates will result in a reduction of the purchased water adjustment factor from \$0.39 per 1,000 gallons to \$0.29 per 1,000 gallons.

807 KAR 5:001, Section 4(5) permits an amendment to a paper to related back to the filing of the original paper if the Commission so orders.

7.

WHEREFORE, Letcher County Water and Sewer District requests that the Commission enter an Order granting Letcher County Water and Sewer District leave to amend its Application for Purchased Water Adjustment and directing that the Amended Application be considered filed as of the date of the filing of the original Application.

Dated: March 11, 2020 Respectfully submitted,

Gerald E. Wuetcher

Stoll Keenon Ogden PLLC

300 West Vine Street, Suite 2100

Lexington, Kentucky 40507

Telephone: (859) 231-3017

Fax: (859) 259-3517

gerald.wuetcher@skofirm.com

Counsel for Letcher County Water and Sewer

District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Letcher County Water and Sewer District's electronic filing of this Motion is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Public Service Commission on March 11, 2020; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that on or before March 13, 2020 this Application in paper medium will be delivered to the Public Service Commission.

Gerald E. Wuetcher