COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

PSC Case 2020-121

In Re Matter of: ELECTRONIC SOUTHERN WATER AND SEWER DISTRICT METER REPLACEMENT SURCHARGE MONITORING

MOTION TO CLARIFY MARCH 17, 2021 ORDER IN CASE 2020-121

Comes Southern Water and Sewer District "Southern", by and through counsel, and hereby requests clarification of the PSC's March 17, 2021 Order;

As the PSC is aware, an Order was issued on March 17, 2021 in Case 2020-121. The relevant portion of said Order is on page 6, ordering paragraph number 3, which states "Southern District is authorized to use up to \$250,000 of the remaining proceeds of the loan approved in Case No. 2020-114 to purchase and install up to ten master meters."

As the PSC should be aware, at the time this Order was entered, the loan approved in Case 2020-114 had already been spent on the purchase and installation of new AMR water meters for all of Southern's water customers. The entirety of this loan approved in Case No. 2020-114 was spent to purchase and install the new AMR meters.

Although Southern had already spent the entirety of the loan approved in 2020-114 at the time the March 17, 2021 Order was entered, said Order authorized Southern to use up to \$250,000 of the remaining proceeds of this loan to purchase and install an additional 10 master meters. Southern has found it difficult to reconcile the facts that existed at the time this Order was entered (all loan proceeds had been spent and thus no remaining proceeds of said loan are available to purchase the master meters) with the language of said Order (Authorizing Southern to use the remaining proceeds of said loan to purchase and install 10 master meters).

Southern hereby requests clarification of Ordering Paragraph 3 of the March 17,

2021 Order in Case # 2020-121. Southern is under the impression that the funds to be used to purchase and install the 10 master meters will come from the proceeds of the Meter Surcharge Bank Account but requests PSC confirmation of this assumption.

WHEREFORE, Southern hereby requests that the PSC provide guidance on the funding source to be used to purchase and install the ten master meters.

WHEREFORE, Southern hereby requests clarification of the relevant portions of the March 17, 2021 Order in Case 2020-121.

Respectfully Submitted Electronically on June 12, 2023,

<u>/s/ Steven Bailey</u> Steven P Bailey, JD/MBA Counsel for Southern Water & Sewer District Bailey Law Office, PSC 181 E Court Street Prestonsburg, KY 4153 (606) 263-4913