

BRIAN CUMBO

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ADMITTED IN KY AND WV

September 15, 2020

Public Service Commission P.O. Box 615 Frankfort, KY 40602

RE: Martin County Water District PSC Case No. 2020-00154

To Whom It May Concern:

Enclosed please find Martin County Water District's Motion to modify Order requiring monthly reporting of purchases from Evans Hardware.

Thank you for your attention to this matter.

Very truly yours,

BRIAN CUMBO

BC/ld Enclosure

ce: Martin County Water District Hon. Mary Varson Cromer

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC MARTIN COUNTY WATER)
DISTRICT MANAGEMENT AND OPERATION)
MONITORING PURSUANT TO KRS 278.250) CASE NO. 2020-00154

MOTION TO MODIFY ORDER REQUIRING MONTHLY REPORTING OF PURCHASES FROM EVANS HARDWARE

Comes the Martin County Water District (hereinafter "District"), by counsel, and moves the Commission for an Order, modifying its' Order of July 22, 2020, and eliminating the monthly reports regarding purchases from Evans Hardware.

Pursuant to the final Order in case number 2018-00017, the District entered into a contact with Alliance Water Resources, Inc. on November 20, 2019. Alliance Water Resources, Inc. has been operating the District since January 1, 2020.

Since Alliance Water Resources, Inc. is now operating the District, the District does not perform any operational tasks, and makes no purchases for goods or services, other than those services outside the scope of the Alliance contract (i.e. insurance, attorney services, auditing services).

Further, that monthly reporting is a financial expense to the District that can be avoided, since no products are, or will be, purchased from Evans Hardware by the District. It is certainly likely Alliance will make purchases, but not the District.

The District is mindful that there may be some outlier need in the future to make a purchase from Evans Hardware, and the District recognizes, should that occur, it must be reported to the Commission.

However, unless such an outlier purchase is made, the District moves to be excused from making monthly reports.

Wherefore, the District requests appropriate Orders of the Commission consistent with this Motion.

BRIAN CUMBO

COUNSEL FOR MARTIN COUNTY

WATER DISTRICT

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CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was emailed on this the day of September, 2020, to the following:

Public Service Commission ATTN: Nancy Vinsel P.O. Box 615 Frankfort, KY 40602 nancy.vinsel@ky.gov

Hon. Mary Varson Cromer Appalachian Citizens' Law Center, Inc. 317 Main Street Whitesburg, KY 41858 mary@appalachianlawcenter.org

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