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ADMITTED IN KY AND WV

June 3, 2021

Linda C. Bridwell, Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

RE: Martin County Water District
PSC Case No. 2021-00154

Dear Ms. Bridwell:

Enclosed please find Response Brief on behalf of Martin County Water District regarding the above matter.

Thank you for your attention to this matter.

Very truly yours,

BRIAN CUMBO

BC/ld

Enclosure

cc: Martin County Water District
Hon. Mary Varson Cromer

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)
MARTIN COUNTY WATER DISTRICT)
FOR ALTERNATIVE RATE ADJUSTMENT)

CASE NO. 2021-00154

**RESPONSE BRIEF ON BEHALF OF MARTIN
COUNTY WATER DISTRICT**

Comes the Martin County Water District, by counsel, and for its' Brief in response to that of the Martin County Concerned Citizens, and states as follows:


The current rates set by the Public Service Commission for the Martin County Water District are insufficient to maintain services and fulfill the obligations of the District, as demonstrated in the District's Application for Rate Adjustment with attachments, and the testimony heard on May 27, 2021. Specifically, Tony Sneed, and the exhibits to which he referred, and which have been admitted, succinctly demonstrates that an increase is necessary (Testimony of T.S. beginning at 13:04:32).

The District further recognizes that affordability is an issue, and is the reason an increase was requested which minimally meets the current needs of the District, and which does not fund depreciation (Testimony of T.S. beginning at 13:18:00). The proposed rate adjustment would generate estimated annual revenue of \$250,834.00, which will enable the District to operate like a business, and meet its' statutory funding requirements.

Like any other business, if the District cannot meet its' financial obligations, it will ultimately fail.

The Martin County Concerned Citizens, in their brief, have raised areas of concern to them, but those concerns do not affect the urgent need for emergency rate relief.

Wherefore, the District requests the appropriate Orders of the Commission.


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CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was emailed on this the 3 day of June, 2021, to the following:

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