#### **COMMONWEALTH OF KENTUCKY**

# **BEFORE THE PUBLIC SERVICE COMMISSION**

## **IN THE MATTER OF:**

ELECTRONIC APPLICATION OF ROWAN WATER,	)	
INC. FOR FINACING APPROVAL PURSUANT TO	)	CASE NO.
KRS 278.300	)	2024-00015

### **MOTION FOR REHEARING OR CLARIFICATION**

Comes now, Rowan Water, Inc., ("Rowan Water" or the "Company"), pursuant to KRS 278.400 and respectfully requests the Kentucky Public Service Commission ("Commission") to grant rehearing on its March 22, 2024 Order in the above-styled case. In support of this motion, Rowan Water respectfully states as follows:

1. On March 22, 2024, the Commission issued an Order granting Rowan Water's application to seek approval to lease three vehicles ("March 22<sup>nd</sup> Order").

2. The Commission's March 22<sup>nd</sup> Order, Ordering Paragraph 1, stated, "Rowan Water is authorized to lease three vehicles identified in its application from Enterprise in **Morehead**, **Kentucky**. The lease maturity date and other terms and conditions of the leases shall be in accordance with those described in Rowan Water's application." (emphasis added)

3. Rowan Water's application requested approval of financing for three leased vehicles. Attached as Exhibit C to the application were the three proposed lease agreements which state the lessor would be "Enterprise Fleet Management". The leases are through the Fleet Management division of Enterprise, which is not located in Morehead, Kentucky. When Rowan Water first began leasing vehicles, Rowan Water contacted the Morehead, Kentucky Enterprise, but Rowan Water was referred to the Enterprise Fleet Management since the local franchise did not offer that service. Each of the leases that Rowan Water had previously entered into, as well as the proposed leases that were provided in this proceeding have all been through Enterprise Fleet Management. Rowan Water's leasing representative that has been assigned by Enterprise Fleet Management is actually located in Missouri.

WHEREFORE, on the basis of the foregoing, Rowan Water respectfully requests that the Commission grant rehearing on the sole issue contained herein. Rowan Water requests that the Commission remove the requirement that the leases be entered into with Enterprise in Morehead, Kentucky and allow the three vehicles to be leased from Enterprise Fleet Management, as the leases provided with the application indicated. Rowan Water will not authorize the proposed leases with Enterprise Fleet Management until such time as the Commission issues an Order on this Motion.

Dated this 26th Day of March, 2024.

Respectfully submitted,

Buttany Hayon Frend L. Allyson Honaker

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## **CERTIFICATE OF SERVICE**

This is to certify that foregoing was submitted electronically to the Commission on March

26, 2024 and that there are no parties that have been excused from electronic filing.

Pursuant to prior Commission orders, no paper copies of this filing will be submitted.

Buttany Hayon Freme Counsel for Rowan Water, Inc.