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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION OF THE CONTRACT)	CASE NO.
FILING OF SOUTH ANDERSON WATER)	2015-00019
DISTRICT TO PROVIDE WHOLESALE WATER)	
SERVICE TO NORTH MERCER WATER)	
DISTRICT)	

**SOUTH ANDERSON WATER DISTRICT'S RESPONSE TO ORDER
OF JANUARY 20, 2015**

1. On what date did South Anderson complete construction of its connection to North Mercer for the purpose of selling water to North Mercer?

Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: The facilities required to provide service to North Mercer Water District were in place on or about August 17, 2012.

2. On what date did South Anderson begin selling water to North Mercer?

Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: The South Anderson Water District began service to the North Mercer Water District in December of 2012.

3. Provide a schedule showing, for each month since South Anderson began selling water to North Mercer, the monthly quantity of water sold to North Mercer and the corresponding amount billed for the water sold.

Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: Please see attached Exhibit "A" which is a schedule that shows the history of water sold to North Mercer Water District by South Anderson Water District, including the quantity purchased and the amount billed.

4. Identify the location of each interconnection between the South Anderson and North Mercer systems. For each interconnection, state the number and size of meters through which service is provided.

Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: The South Anderson Water District and North Mercer Water District are interconnected at the Anderson-Mercer County line adjacent to U.S. 127 South. This is the only interconnection between the two districts and service is provided through a four inch master meter.

5. Refer to part-2(C) of the September 19, 2012, Agreement ("2012 Agreement") between South Anderson and North Mercer at page 3 of 7, which states that "South Anderson, while Municipal Water Bonds remain outstanding and unpaid, may increase the rates and charges for services of the South Anderson annually by an amount equal to the most recent annual increase in the Producer Price Index (formerly Wholesale Price Index), provided such increase shall not exceed a maximum of 2% (two percent) in any one year, if the mandated fund coverages set forth above in South Anderson's Bond Ordinances have been met."

- a. State the current rate that South Anderson applies to North Mercer's water purchases from South Anderson.

Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: Please see attached Exhibit "B" which provides current rates as applied to the North Mercer Water District.

- b. State whether South Anderson has sought to increase the rates stated in parts-(1)(C)(a) & (b) of the 2012 Agreement. If so, for each increase, state the date and amount of the increase.

Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: The only increase that has been applied to the North Mercer account was a "pass through" amount effective August 1, 2013 mandated by an increase of the fee from the Kentucky River Authority to South Anderson's suppliers. The Public Service Commission approved South Anderson Water District's Purchase Water Adjustment application. Although the Purchase Water Adjustment did not specifically specify the wholesale rate to North Mercer Water District, the wholesale water sold to North Mercer was used in the calculation made to determine the appropriate rate adjustment.

- c. State whether South Anderson has provided North Mercer with notice of an intent to increase the rates pursuant to Part-(2)(C) of the 2012 Agreement. If so, for each notice, provide a copy of the notice.

Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: The rates have not been increased pursuant to Part-2(C) of the Agreement thus no notice of intent has been provided.

- d. State the current rate that South Anderson uses for service to North Mercer.

Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: Please see attached Exhibit "B" which provides current and previous rates as applied to North Mercer Water District.

6. Explain why South Anderson chose to rely upon the Producer price Index as a measure in determining the amount of a possible annual rate increase.

Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: South Anderson has never relied upon the Producer Price Index as a measure for determining a possible annual rate increase. The language of Part-2(C) of the September 19, 2012 of the Agreement between South Anderson and North Mercer at page 3 of 7 was included so that in the very limited circumstances as described in Part-2(C), the rates agreed upon between the two (2) Districts "may" be increased not more than "2% in any one year" without incurring extensive costs and time by either District.

7. Provide the Producer Price Index information for the period of September 1, 2012, to date, and stat the amounts that South Anderson identified and used as the “most recent annual increase” since September 1,2012, for purpose of part-(2)(C) of the 2012 Agreement.

Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: The South Anderson Water District never intended to exercise the clause in the 2012 agreement with the North Mercer Water District. The Producer Price Index for Total Manufacturing Industries as published by U.S. Bureau of Labor Statistics is attached hereto as Exhibit “C.”

8. State whether there have been any amendments to the 2012 Agreement. If so, provide a copy of each amendment.

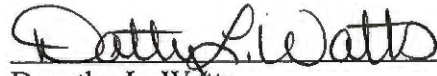
Witness(es): Shawn Cook, Supervisor of Operation of South Anderson Water District; Kenneth D. Taylor, Kenvirons

Response: There have been no amendments to the 2012 Agreement between South Anderson Water District and North Mercer Water District.

CERTIFICATION

I, Dorothy L. Watts, certify that I am the attorney supervising the preparation of these Responses on behalf of South Anderson Water District and that the Responses and attachments hereto are true and accurate to the best of my knowledge, information and belief formed after reasonable inquiry.

Respectfully Submitted,



Dorothy L. Watts
148 South Main Street
Lawrenceburg, Kentucky 40342

Attorney for South Anderson Water District

This the 3rd day of February, 2015.

CERTIFICATE OF SERVICE

I, Dorothy L. Watts, certify that on the 3rd day of February, 2015, a copy of South Anderson Water District's Response to the Commission's Order of January 20, 2015, was served by first class, U.S. Mail to Thomas M. Jones, 138 S. Main Street, Lawrenceburg, Kentucky 40342, and by hand delivery of an original and ten copies to Jeff Derouen, Executive Director, Kentucky Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615.



Dorothy L. Watts

South Anderson Water
Customer History R

Attachment "A"

Service Type All
AR Code All
Beginning Date All
Ending Date

Use Reading Factor
Start Balance With Zero
Print Breakdown By Transaction Service Taxes Totals Only

History For Account 0001-01513-001 North Mercer Water Dist.,

Tran Date	Post Date	Code	Description	Service Desc	Usage	Service Local Tax	Surcharge1 State Tax	Surcharge2 Penalty	Unapplied	Balance
01/09/13	01/09/13	WTB	Water Billing	WATER	10	\$9,249.90	\$0.00	\$0.00		
	LisaS				2,206,000	\$0.00	\$0.00	\$0.00	\$0.00	\$9,249.90
01/17/13	01/17/13	101	Check	WATER	10	(\$9,249.90)	\$0.00	\$0.00	\$0.00	\$0.00
	<input type="checkbox"/> JUDY H				0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
02/07/13	02/07/13	WTB	Water Billing	WATER	10	\$9,249.90	\$0.00	\$0.00		
	JUDY H				1,030,300	\$0.00	\$0.00	\$0.00	\$0.00	\$9,249.90
02/25/13	02/25/13	101	Check	WATER	10	(\$9,249.90)	\$0.00	\$0.00	\$0.00	\$0.00
	<input type="checkbox"/> BRENDA				0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
03/06/13	03/06/13	WTB	Water Billing	WATER	10	\$9,249.90	\$0.00	\$0.00		
	JUDY H				1,172,400	\$0.00	\$0.00	\$0.00	\$0.00	\$9,249.90
03/25/13	03/25/13	101	Check	WATER	10	(\$9,249.90)	\$0.00	\$0.00	\$0.00	\$0.00
	<input type="checkbox"/> JUDY H				0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
04/08/13	04/08/13	WTB	Water Billing	WATER	10	\$9,249.90	\$0.00	\$0.00		
	LisaS				2,062,000	\$0.00	\$0.00	\$0.00	\$0.00	\$9,249.90
04/15/13	04/15/13	101	Check	WATER	10	(\$9,249.90)	\$0.00	\$0.00	\$0.00	\$0.00
	<input type="checkbox"/> JUDY H				0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
05/09/13	05/09/13	WTB	Water Billing	WATER	10	\$9,249.90	\$0.00	\$0.00		
	JUDY H				861,500	\$0.00	\$0.00	\$0.00	\$0.00	\$9,249.90
05/17/13	05/17/13	101	Check	WATER	10	(\$9,249.90)	\$0.00	\$0.00	\$0.00	\$0.00
	<input type="checkbox"/> LisaS				0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
06/07/13	06/07/13	WTB	Water Billing	WATER	10	\$9,249.90	\$0.00	\$0.00		
	JUDY H				983,500	\$0.00	\$0.00	\$0.00	\$0.00	\$9,249.90
06/17/13	06/17/13	101	Check	WATER	10	(\$9,249.90)	\$0.00	\$0.00	\$0.00	\$0.00
	<input type="checkbox"/> LisaS				0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
07/09/13	07/09/13	WTB	Water Billing	WATER	10	\$9,249.90	\$0.00	\$0.00		
	LisaS				703,900	\$0.00	\$0.00	\$0.00	\$0.00	\$9,249.90
07/22/13	07/23/13	101	Check	WATER	10	(\$9,249.90)	\$0.00	\$0.00	\$0.00	\$0.00
	<input type="checkbox"/> LisaS				0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
08/08/13	08/08/13	WTB	Water Billing	WATER	10	\$9,249.90	\$0.00	\$0.00		
	LisaS				1,070,700	\$0.00	\$0.00	\$0.00	\$0.00	\$9,249.90
08/23/13	08/23/13	101	Check	WATER	10	(\$9,249.90)	\$0.00	\$0.00	\$0.00	\$0.00
	<input type="checkbox"/> JUDY H				0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
09/09/13	09/09/13	WTB	Water Billing	WATER	10	\$14,650.82	\$0.00	\$0.00		
	JUDY H				4,885,100	\$0.00	\$0.00	\$0.00	\$0.00	\$14,650.82
09/20/13	09/20/13	101	Check	WATER	10	(\$14,650.82)	\$0.00	\$0.00	\$0.00	\$0.00
	<input type="checkbox"/> JUDY H				0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
10/08/13	10/08/13	WTB	Water Billing	WATER	10	\$19,547.70	\$0.00	\$0.00		
	LisaS				6,705,500	\$0.00	\$0.00	\$0.00	\$0.00	\$19,547.70

History For Account 0001-01513-001 North Mercer Water Dist.,

Tran	Date	Post Date	Code	Description	Service Desc	Service Usage	Service Local Tax	Surcharge1 State Tax	Surcharge2 Penalty	Unapplied	Balance
	10/18/13	10/18/13	101	Check	WATER	10	(\$19,547.70)	\$0.00	\$0.00		
			<input type="checkbox"/>	LisaS		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	11/06/13	11/06/13	WTB	Water Billing	WATER	10	\$9,579.90	\$0.00	\$0.00		
				LisaS		2,504,800	\$0.00	\$0.00	\$0.00	\$0.00	\$9,579.90
	11/18/13	11/18/13	101	Check	WATER	10	(\$9,579.90)	\$0.00	\$0.00		
			<input type="checkbox"/>	JUDY H		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	12/06/13	12/06/13	WTB	Water Billing	WATER	10	\$9,579.90	\$0.00	\$0.00		
				JUDY H		1,764,100	\$0.00	\$0.00	\$0.00	\$0.00	\$9,579.90
	12/17/13	12/17/13	101	Check	WATER	10	(\$9,579.90)	\$0.00	\$0.00		
			<input type="checkbox"/>	LisaS		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	01/09/14	01/09/14	WTB	Water Billing	WATER	10	\$9,579.90	\$0.00	\$0.00		
				LisaS		1,629,900	\$0.00	\$0.00	\$0.00	\$0.00	\$9,579.90
	01/17/14	01/17/14	101	Check	WATER	10	(\$9,579.90)	\$0.00	\$0.00		
			<input type="checkbox"/>	JUDY H		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	02/06/14	02/06/14	WTB	Water Billing	WATER	10	\$9,579.90	\$0.00	\$0.00		
				JUDY H		2,902,200	\$0.00	\$0.00	\$0.00	\$0.00	\$9,579.90
	02/20/14	02/20/14	101	Check	WATER	10	(\$9,579.90)	\$0.00	\$0.00		
			<input type="checkbox"/>	LisaS		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	03/07/14	03/07/14	WTB	Water Billing	WATER	10	\$9,579.90	\$0.00	\$0.00		
				LisaS		888,000	\$0.00	\$0.00	\$0.00	\$0.00	\$9,579.90
	03/21/14	03/21/14	101	Check	WATER	10	(\$9,579.90)	\$0.00	\$0.00		
			<input type="checkbox"/>	JUDY H		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	04/08/14	04/08/14	WTB	Water Billing	WATER	10	\$13,640.72	\$0.00	\$0.00		
				JUDY H		4,509,600	\$0.00	\$0.00	\$0.00	\$0.00	\$13,640.72
	04/17/14	04/17/14	101	Check	WATER	10	(\$13,640.72)	\$0.00	\$0.00		
			<input type="checkbox"/>	LisaS		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	05/07/14	05/07/14	WTB	Water Billing	WATER	10	\$10,219.04	\$0.00	\$0.00		
				LisaS		3,237,600	\$0.00	\$0.00	\$0.00	\$0.00	\$10,219.04
	05/22/14	05/22/14	101	Check	WATER	10	(\$10,219.04)	\$0.00	\$0.00		
			<input type="checkbox"/>	LisaS		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	06/06/14	06/06/14	WTB	Water Billing	WATER	10	\$13,952.76	\$0.00	\$0.00		
				JUDY H		4,625,600	\$0.00	\$0.00	\$0.00	\$0.00	\$13,952.76
	06/18/14	06/16/14	101	Check	WATER	10	(\$13,952.76)	\$0.00	\$0.00		
			<input type="checkbox"/>	BRENDA		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	07/08/14	07/08/14	WTB	Water Billing	WATER	10	\$13,080.94	\$0.00	\$0.00		
				LisaS		4,301,500	\$0.00	\$0.00	\$0.00	\$0.00	\$13,080.94
	07/17/14	07/17/14	101	Check	WATER	10	(\$13,080.94)	\$0.00	\$0.00		
			<input type="checkbox"/>	JUDY H		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	08/06/14	08/06/14	WTB	Water Billing	WATER	10	\$9,579.90	\$0.00	\$0.00		
				JUDY H		2,623,400	\$0.00	\$0.00	\$0.00	\$0.00	\$9,579.90
	08/25/14	08/25/14	101	Check	WATER	10	(\$9,579.90)	\$0.00	\$0.00		
			<input type="checkbox"/>	LisaS		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	09/05/14	09/05/14	WTB	Water Billing	WATER	10	\$10,976.82	\$0.00	\$0.00		
				LisaS		3,519,300	\$0.00	\$0.00	\$0.00	\$0.00	\$10,976.82

History For Account 0001-01513-001 North Mercer Water Dist.,

Tran	Date	Post Date	Code	Description	Service Desc	Service Usage	Service Local Tax	Surcharge1 State Tax	Surcharge2 Penalty	Unapplied	Balance
	09/17/14	09/17/14	101	Check	WATER	10	(\$10,976.82)	\$0.00	\$0.00		
				<input type="checkbox"/> BRENDA		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	10/08/14	10/08/14	WTB	Water Billing	WATER	10	\$10,298.67	\$0.00	\$0.00		
				LisaS		3,267,200	\$0.00	\$0.00	\$0.00	\$0.00	\$10,298.67
	10/23/14	10/23/14	101	Check	WATER	10	(\$10,298.67)	\$0.00	\$0.00		
				<input type="checkbox"/> LisaS		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	11/06/14	11/06/14	WTB	Water Billing	WATER	10	\$9,579.90	\$0.00	\$0.00		
				LisaS		2,991,600	\$0.00	\$0.00	\$0.00	\$0.00	\$9,579.90
	11/17/14	11/17/14	101	Check	WATER	10	(\$9,579.90)	\$0.00	\$0.00		
				<input type="checkbox"/> JUDY H		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	12/08/14	12/08/14	WTB	Water Billing	WATER	10	\$9,579.90	\$0.00	\$0.00		
				LisaS		2,428,600	\$0.00	\$0.00	\$0.00	\$0.00	\$9,579.90
	12/18/14	12/18/14	101	Check	WATER	10	(\$9,579.90)	\$0.00	\$0.00		
				<input type="checkbox"/> JUDY H		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	01/06/15	01/06/15	WTB	Water Billing	WATER	10	\$9,987.60	\$0.00	\$0.00		
				JUDY H		2,878,800	\$0.00	\$0.00	\$0.00	\$0.00	\$9,987.60
	01/21/15	01/21/15	101	Check	WATER	10	(\$9,987.60)	\$0.00	\$0.00		
				<input type="checkbox"/> LisaS		0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	01/22/15	01/22/15	105	Payment Revel		0	\$0.00	\$0.00	\$0.00	(\$407.70)	(\$407.70)
				LisaS			\$0.00	\$0.00	\$0.00		
Total For Selection							\$0.00	\$0.00	\$0.00		
							\$0.00	\$0.00	\$0.00	(\$407.70)	(\$407.70)
Ending Balance							\$0.00	\$0.00	\$0.00		
							\$0.00	\$0.00	\$0.00	(\$407.70)	(\$407.70)

ATTACHMENT B

NORTH MERCER WATER DISTRICT RATES

Initial rates in effect August 2012 thru July 2013. (Contract dated 8/9/12)

Minimum Bill \$9,249.90 (First 3,000,000 gallons at \$3.0833/1,000 gallons)
All over 3,000,000 gallons at \$2.58/1,000 gallons

Initial Water Bill January 9, 2014 (2,206,000 gallons paid minimum bill of \$9,249.90)

Revised rates in effect August 2013 thru December 2014. Rate increased \$0.11/1,000 gallons due to increase in KY River Authority fee charged to supplier, Lawrenceburg and Frankfort.

Minimum Bill \$9,579.90 (First 3,000,000 gallons at \$3.1933/1,000 gallons)
All over 3,000,000 gallons at \$2.69/1,000 gallons

Revised rates in effect December 2014 to present. Rates increased due to increase in rates charged by suppliers, Lawrenceburg and Frankfort.

Proposed: Minimum Bill \$9,987.60 (First 3,000,000 gallons at \$3.3292/1,000 gallons)
All over 3,000,000 gallons at \$2.8259/1,000 gallons

PSC Approved: Minimum Bill \$9,699.90 (First 3,000,000 gallons at \$3.2233/1,000 gallons)

All over 3,000,000 gallons at \$2.72/1,000 gallons

ATTACHMENT C

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Databases, Tables & Calculators by Subject

FONT SIZE:

Change Output Options: From: 2004 To: 2014

include graphs include annual averages

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Data extracted on: January 27, 2015 (6:19:06 PM)

Producer Price Index Industry Data

Series Id: PC00MFG--OMFG--
 Industry: Total manufacturing industries
 Product: Total manufacturing industries
 Base Date: 198412

Download: .xlsx

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2004	138.9	139.3	140.3	141.8	143.3	142.9	143.2	143.7	144.2	146.5	146.1	145.0	142.9
2005	146.2	147.0	148.9	149.6	149.4	149.6	151.0	151.8	154.2	156.6	152.7	152.8	150.8
2006	154.1	153.5	155.0	157.2	158.5	159.5	159.4	159.8	156.8	155.9	156.4	156.9	156.9
2007	156.4	157.7	160.1	162.2	163.8	163.7	164.9	163.0	163.7	164.5	168.0	166.9	162.9
2008	168.5	169.6	173.4	175.3	179.4	182.0	185.6	182.6	182.9	176.8	169.4	164.1	175.8
2009	164.7	163.9	162.9	164.2	165.8	168.4	167.1	169.4	168.6	168.9	170.7(R)	170.8	167.1
2010	173.1	172.2	173.9	175.2	176.1	174.8	174.7	175.3	175.5	177.3	178.2	179.1	175.4
2011	181.1	183.3	187.3	190.2	191.9	191.1	191.7	190.7	191.5	190.2	190.6	189.6	189.1
2012	191.1	192.1	194.3	194.7	193.6	191.7	191.2	193.5	195.4	195.1	192.6	191.8	193.1
2013	192.6	195.2	194.5	194.0	194.0	193.9	194.0	194.6	194.3	193.7	192.7	193.2	193.9
2014	194.2	195.2	196.2	197.5	197.2	197.2	197.4	197.4	196.8(P)	195.0(P)	192.8(P)	189.5(P)	195.5(P)

R : Revised
 P : Preliminary. All indexes are subject to revision four months after original publication.

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