

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE FEASIBILITY	)	
OF PROPOSED MERGER OF CAWOOD	)	CASE NO.
WATER DISTRICT AND BLACK MOUNTAIN	)	2018-00068
UTILITY DISTRICT PURSUANT TO KRS 74.361	)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO CAWOOD WATER DISTRICT

Cawood Water District ("Cawood District") pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies in paper medium of the following information. The information requested herein is due within 14 days of the entry of this Order. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed and shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Cawood District shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Cawood

District fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, Cawood District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Cawood District's response to Commission Staff's Second Request for Information ("Staff's Second Request"), Item 2(b).

a. Provide a detailed list of other Kentucky utilities, if any, that have a similar policy providing a monthly stipend to full-time employees to assist in "defraying general personal expenses" and to "share" cost savings from medical insurance costs.

b. Explain why Cawood District made the decision to provide a monthly stipend to its full-time employees instead of placing the monetary amount in salaries and wages.

c. Provide the general raise that Cawood District has given to its full-time and part-time employees for each of the last ten years.

2. Refer to Cawood District's response to Staff's Second Request, Item 2(c).

a. Confirm that Cawood District makes bank deposits every single business day.

b. If the answer to 2(a) is confirmed, explain if Cawood District has to make bank deposits every single business day, or if there is an alternative solution.

c. If the answer to 2(a) is not confirmed, provide the number of times per week Cawood District makes a bank deposit.

d. Explain if Cawood District has ever considered implementing a standard mileage reimbursement plan where employees are reimbursed a designated amount of cents per mile for driving their personal vehicle for business purposes, instead of providing a flat fee. If not, explain why not.

e. Confirm whether Cawood District has a company vehicle for employees to utilize when conducting business for Cawood District. If confirmed, explain why Cawood employees, such as the clerk, are not allowed to use the company vehicle to make the bank deposits.

3. Refer to Cawood District's response to Staff's Second Request, Item 4(c)(1).

a. Provide an explanation as to why Cawood District made the decision to use Kentucky Rural Water Association's water use and loss report forms instead of using Commission produced water use and loss report forms.

b. Provide Cawood District's monthly water use and loss reports from January 2017–May 2018 without any redactions.

c. Explain why Cawood District redacted the submitted water use and loss reports for January 2017–April 2018, and why the unknown loss percentage next to the redacted information was handwritten.

d. Explain how Cawood District is calculating the following water usage on the monthly water use and loss reports: water treatment plant, system flushing, and disinfection byproduct (“DBP”) flushing.

e. Provide Cawood District’s system flushing records from January 2017–April 2018.

5. Provide a copy of all purchased power invoices that Cawood District paid during the calendar year ended December 31, 2016. Provide a legend for each address on the invoices that differentiates service related to the Cawood District service area or the Pathfork service area.

  
Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED     **JUN 05 2018**    

cc: Parties of Record

\*Black Mountain Utility District  
Black Mountain Utility District  
609 Four Mile Road  
Baxter, KY 40806-8437

\*M. Evan Buckley  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504

\*Cawood Water District  
54 Plant Road  
P. O. Box 429  
Cawood, KY 40815

\*Cawood Water District  
Cawood Water District  
54 Plant Road  
P. O. Box 429  
Cawood, KY 40815

\*Mark David Goss  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504