

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION OF THE OPERATING	)	
CAPACITY OF MARTIN COUNTY WATER	)	CASE NO.
DISTRICT PURSUANT TO KRS 278.280	)	2016-00142

COMMISSION STAFF'S THIRD POST-HEARING REQUEST  
FOR INFORMATION TO MARTIN COUNTY WATER DISTRICT

Martin County Water District ("Martin District"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on or before November 8, 2017. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response 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.

Martin 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 Martin 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. Martin District shall review these requests and its responses no less frequently than every 30 days and shall make such supplemental filings as necessary in order to submit additional information for the continuing requests for information until the next scheduled hearing in this matter.

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, Martin 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. Provide each Monthly Water Use Report for the period May 2017 through October 2017. Each report should include water loss due to flushing. This is a continuing request until the next scheduled hearing.

2. For the period beginning August 1, 2017, to the present, provide each memorandum or other correspondence between Martin District and the Kentucky Rural Water Association. This is a continuing request until the next scheduled hearing.

3. By month, for the period beginning August 1, 2017, to the present, provide the amount of coal severance funds received by Martin County. This is a continuing request until the next scheduled hearing.

4. By month, for the period beginning August 1, 2017, to the present, provide the amount of coal severance funds allocated by Martin County to Martin District. This is a continuing request until the next scheduled hearing.

5. Provide an update on efforts to obtain funding for Project Rejuvenate from August 1, 2017, to present. This is a continuing request until the next scheduled hearing.

6. At the October 17, 2017, hearing witnesses testified to a potential lease of Martin District's Honey Branch water tank between Martin District and the Prestonsburg City's Utilities Commission ("Prestonsburg"). Regarding this lease:

a. Provide Martin District's understanding of Commission jurisdiction over special contracts of Martin District;

b. Provide the legal authority by which Martin District believes it may lease the Honey Branch tank to another entity, given that the facilities were funded by grants or low-interest loans received for the purpose of serving Martin District's customers;

c. State whether, as a result of the lease, Prestonsburg may serve some Martin District customers. Provide a detailed explanation of this arrangement and state whether this arrangement will be fully discussed in the lease.

d. Provide all supporting calculation, state all assumptions, and provide all alternatives that were considered or used in determining the \$15,000 per month rental fee in the proposed lease.

e. State how are revenues from the proposed lease to be used.

f. State when the Honey Branch tank was built.

g. Provide the Commission case number in which the Commission approved the construction of the Honey Branch tank.

7. Provide any documents, correspondence, recommendations etc., provided by BlueWater to Martin District since July 1, 2017.

8. Provided water loss for each month from June 2017 until present.
9. With regard to the Amendment to the Joint Operation Agreement with Prestonsburg, explain in detail how Martin District calculated the increase from \$3.05 per 1,000 gallons to \$7.75 per 1,000 gallons for sales over 112,000 gallons.
  - a. Explain why Martin District did not raise the rate for the first 112,000 gallons.
10. Provide the total amount of past-due accounts.
  - a. Provide the past-due accounts, by name, beginning with the oldest account.
11. Provide the amount of non-revenue water loss (i.e., water loss due to flushing) from January 1, 2017, until present.
12. Provide the number of customers that Martin District has added and/or lost from January 1, 2017, until present.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED OCT 25 2017

cc: Parties of Record

Case No. 2016-00142

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