

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF MURRAY WATER DISTRICT #2)	
FOR AN ORDER APPROVING A TRANSFER OF)	CASE NO.
OWNERSHIP AND CONTROL TO THE CITY OF)	2019-00413
MURRAY)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO MURRAY WATER DISTRICT #2 AND THE CITY OF MURRAY

Murray Water District #2 (Murray District #2) and the city of Murray, Kentucky (Murray), collectively (Joint Applicants), pursuant to 807 KAR 5:001, are to file with the Commission the original and six copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due on or before December 20, 2019. Responses to requests for information in paper medium 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 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.

Joint Applicants shall make timely amendments to any prior response if the Joint Applicants obtain 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 Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Exhibit 12 of the application is a letter to all customers of Murray District #2 dated June 13, 2019.

a. State whether the letter was mailed to each customer of Murray District #2.

b. Provide a copy of all written responses received to the June 13, 2019 letter.

c. Provide a description of any non-written responses to the letter.

2. KRS 278.020(6) requires the Commission to find that the person acquiring a utility that is subject to its jurisdiction possesses the financial, technical, and managerial abilities to provide reasonable service. At page 3, paragraph 13, Joint Applicants state that "The Commission should approve the transfer by WD #2 pursuant to

KRS 278.020(4). Murray has the financial, technical, and managerial abilities to continue to provide reasonable service following the Proposed Transaction.”

a. Describe in detail Murray’s technical ability and resources to manage and operate the Murray District #2’s water distribution system.

b. Identify the Murray employees who will manage and operate Murray District #2’s water system and describe each employee’s qualifications to operate and manage a water distribution system.

c. Describe Murray’s financial ability and resources to manage and operate Murray District #2’s water distribution system, including, but not limited to, available funds, lines of credit, loans, grants, or other financial support.

d. Describe in detail Murray’s management ability and resources to manage and operate Murray District #2’s water distribution system.

3. KRS 278.020(7) states that, in order to approve the transfer, the Commission must find that the proposed transaction “is to be made in accordance with law, for a proper purpose and is consistent with the public interest.” Explain in detail how the proposed transaction to transfer Murray District #2’s water distribution system to Murray is in accordance with the law, for a proper purpose, and benefits the public.

4. Provide the proposed journal entry that Murray will use to record the transfer.

5. Provide a copy of Murray’s balance sheet, income statement, and statement of retained earnings for the fiscal year ending June 30, 2019.

6. Describe the internal standards and policies of Murray regarding service reliability and quality of its water utility operations.

7. Provide all of Murray's written standards or policies related to service quality and reliability of water utility operations.

8. Provide in table format an analysis of the number and type of consumer complaints that Murray received during the period from 2013 to 2018 and how such complaints were resolved.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED DEC 12 2019

cc: Parties of Record

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