

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PROPOSED ADJUSTMENT OF)	CASE NO.
THE WHOLESALE WATER SERVICE RATES)	2019-00444
OF PRINCETON WATER AND WASTEWATER)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO PRINCETON WATER AND WASTEWATER

Princeton Water and Wastewater (Princeton), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on May 15, 2020. The Commission directs Princeton to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

Princeton shall make timely amendment to any prior response if Princeton 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 Princeton fails or refuses to furnish all or part of the requested information, Princeton 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, Princeton shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Validate and identify the position and title Tracy Musgove currently holds with Princeton if she is an employee of Princeton.

2. Provide a detailed and descriptive itemization of the duties performed by Tracy Musgove and the average hours per week spent performing each of those duties in her capacity as Director of Finance for the period July 1, 2019, through December 31, 2019. Also, provide a detailed and descriptive itemization of the duties and hours spent

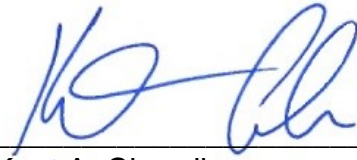
on each task Ms. Musgove currently performs for Princeton for January 1, 2020, up to the present. Princeton's lists should include but not limited to the tasks, hours, rate paid, and how those should be allocated between the salary in her position with Princeton and the expense incurred directly from working on the rate case.

3. If Ms. Musgove is not an employee of Princeton, confirm her retirement date and whether she has been engaged as a paid contractor for services performed after that date. Provide copies of board minutes and a copy of the Agreement between Ms. Musgove and Princeton detailing her responsibilities; hourly rate of compensation and any other associated costs, benefits, or fees for her services as a paid contractor; and the amount that has been paid to Ms. Musgove for services performed under that Agreement.

4. For the employees #155, #201, #209, and #210, separately identify the position, hours, wages, and benefits.

5. Refer to Princeton's response to Commission Staff's First Request for Information, Item 11. In the submitted Excel spreadsheet for the fiscal year ending June 30, 2019, Princeton did not provide evidence that its part-time employees receive insurance or retirement benefits. Confirm that Princeton does not currently offer insurance and retirement benefits to its part-time employees. If it does provide these benefits to its part-time employees, provide the minutes from its Board of Commissioners approving this change, the part-time definition criteria established by the board to be considered eligible for receiving benefits, and the part-time employee benefits provided by month and by employee in 2020.

6. List the overhead expenses included in Capitalized Labor Cost including but not limited to labor costs, employee insurance premiums, retirement, and payroll taxes.



Kent A. Chandler
Executive Director
Public Service Commission
P.O. Box 615
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DATED MAY 08 2020

cc: Parties of Record

Case No. 2019-00444

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