

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO TRANSFER)	
OF OWNERSHIP TO PRESTONSBURG CITY)	
UTILITIES COMMISSION OF THE)	CASE NO.
WASTEWATER SYSTEM AND CERTAIN)	2020-00228
PORTIONS OF THE WATER SYSTEM OF)	
SOUTHERN WATER AND SEWER DISTRICT)	
PURSUANT TO KRS 278.250 AND KRS 278.390)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO SOUTHERN WATER AND SEWER DISTRICT
AND PRESTONSBURG CITY UTILITIES COMMISSION

Southern Water and Sewer District (Southern District) and Prestonsburg City Utilities Commission (PCUC), pursuant to 807 KAR 5:001, are to file with the Commission an electronic version of the following information. The information requested herein is due within ten days of the date of this request. The Commission directs Southern District and PCUC 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.

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.

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.

Southern District and PCUC shall make timely amendment to any prior response if they obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Southern District and PCUC fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their 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, Southern District and PCUC 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 the Amended Asset Purchase Agreement, page 2, which uses the

term “Designated Water Assets.” Provide a definition of or file into the record a document that provides a definition of the water assets included in this term.

2. Provide a copy of a document that evidences the city of Prestonsburg’s ratification of the Amended Asset Purchase Agreement.

3. Refer to the Asset Purchase Agreement, paragraph 11, which filed into the record as PSC Staff Exhibit 2 at the September 1, 2020 hearing. If the Commission approves the proposed asset transfer, explain whether PCUC will seek an amendment of this contract term in order to charge customers in the Stanville/Betsy Layne/Harold areas the same rate as PCUC currently charges its other customers after the proposed transaction closes.

4. Refer to the Financial Management Services Contract, paragraphs 6 and 7, which state that Southern District will terminate a customer’s water service for nonpayment in accordance with its Residential Retail Billing Procedure and that any partial payments from customers are first applied to amounts due to Southern District. Explain whether Southern District and PCUC will revise this contract term to allow for termination of water service in the event of nonpayment of wastewater services provided by PCUC, but billed and collected by Southern District.



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DATED SEP 02 2020

cc: Parties of Record

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