

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ALLEN COUNTY)	CASE NO.
WATER DISTRICT FOR AN ALTERNATIVE RATE)	2020-00296
ADJUSTMENT)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO ALLEN COUNTY WATER DISTRICT

Allen County Water District (Allen District), 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 within 14 days of the date of this request. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Allen District SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies 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.

Allen District shall make timely amendment to any prior response if Allen District obtains 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 Allen District fails or refuses to furnish all or part of the requested information, Allen District 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, Allen 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 copies of each of the following. When appropriate, provide in Excel spreadsheet format with all formulas intact and unprotected and all rows and columns fully accessible.

- a. Trial balance for the calendar years 2018, 2019, and 2020 to date.
- b. Schedule of notes and bonds payable on December 31, 2018, December 31, 2019, and the current period.

c. All debt agreements and bond ordinances and amortization schedules, including related party debt.

d. Insurance policies for 2018 and 2019 and the current period, if available.

e. Hours worked by each employee for the calendar year 2019.

f. A document listing the names, job titles, job description, and pay rates for each employee on December 31, 2017, December 31, 2018, December 31, 2019, and for those currently employed.

g. List and describe all employee benefits, other than salaries and wages, paid to, or on behalf of, each employee for each of the previous five years.

h. Minutes from Allen District Commissioner meetings for the calendar years 2018, 2019, and the current period.

i. A document listing the name of all Commissioners for each of the five previous years, and state, individually, the total amount of each benefit paid to, or on the behalf of, each Commissioner during each year (i.e., wages, health insurance premiums, life insurance premiums, FICA taxes, etc.).

j. Fiscal Court minutes approving each Commissioner's compensation.

2. Provide a copy of the Adjusted Trial Balance showing unaudited account balances, audit adjustments, and audited balances for the calendar year ended 2019 in Excel spreadsheet format with all formulas intact and unprotected and all rows and columns fully accessible.

3. Refer to Allen District's application, Attachment 1, Customer Notice. Allen District proposes to raise its monthly water service rates by an across-the-board percentage amount.

a. Provide an explanation of how the across-the-board percentage increase method to increase monthly water service rates was chosen.

b. Provide a list of alternative methods Allen District considered and an explanation as to why each alternative was not chosen to increase its monthly water service rates.

4. Refer to Allen District's application, Attachment 6, Billing Analysis.

a. Provide the source of the 2019 usage data presented in the Billing Analysis and state whether any adjustments were made to the data.

b. Provide a list of any adjustments made to the data and include an explanation of each adjustment.

5. A review of records on file with the Commission shows that Allen District has never filed a cost of service study (COSS) in a rate case.

a. Explain whether Allen District considered filing a rate application with a COSS.

b. If Allen District has never had a COSS performed to set the rates of its system, explain how the rates can be considered cost-based rates.



Kent A. Chandler
Acting Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 14 2020

cc: Parties of Record

Case No. 2020-00296

*Allen County Water District
330 New Gallatin Road
P. O. Box 58
Scottsville, KY 42164

*DeAnn Marquez
Allen County Water District
330 New Gallatin Road
P. O. Box 58
Scottsville, KY 42164

*Alan Vilines
Kentucky Rural Water Association
Post Office Box 1424
1151 Old Porter Pike
Bowling Green, KENTUCKY 42102-1424