## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF LEVEE	)	
ROAD WATER ASSOCIATION, INC. FOR A	)	
CERTIFICATE OF PUBLIC CONVENIENCE	)	
AND NECESSITY TO CONSTRUCT A	)	CASE NO.
SYSTEM IMPROVEMENTS PROJECT AND	)	2021-00015
AN ORDER APPROVING A CHANGE IN	)	
RATES AND AUTHORIZING THE ISSUANCE	)	
OF SECURITIES PURSUANT TO KRS 278.023	)	

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO LEVEE ROAD WATER ASSOCIATION, INC.

Levee Road Water Association, Inc. (Levee Road Water), 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 five days of the date of this request. The Commission directs Levee Road Water 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.

<sup>&</sup>lt;sup>1</sup> 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.

Levee Road Water shall make timely amendment to any prior response if Levee Road Water 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 Levee Road Water fails or refuses to furnish all or part of the requested information, Levee Road Water 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, Levee Road Water 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 Application, Exhibit D, Certificate of the President. The President of Levee Road Water certifies "That the rates of the Association shall produce

the total revenue requirements set out in the engineering reports." Commission regulation 807 KAR 5:069, Section 2(6)(c), provides the proposed rates, if any, shall produce the total revenue requirements recommended in the engineering reports. Provide a copy of the billing analysis in Excel spreadsheet format with all formulas intact and unprotected and all rows and columns fully accessible, showing revenue at current rates and at proposed rates based on actual and forecasted water usage for the existing system for 12 months that supports the revenue requirement recommended in the Engineering Report and referenced by the president of Levee Road Water.

- 2. Provide a schedule in Excel spreadsheet format with all formulas intact and unprotected and all rows and columns fully accessible showing that Levee Road Water met the debt service coverage requirements of its lenders in calendar years 2017, 2018, and 2019.
- 3. Provide a schedule in Excel spreadsheet format with all formulas intact and unprotected and all rows and columns fully accessible showing that Levee Road Water will meet the debt service coverage requirements of its lenders (existing and proposed long-term debt) for the three years following the completion of its proposed construction project. Include all calculations, assumptions (customer growth and increases in operating expenses), and workpapers used by Levee Road Water in its response.
- 4. Provide a schedule in Excel spreadsheet format with all formulas intact and unprotected and all rows and columns fully accessible showing Levee Road Water's debt service coverage (existing and proposed long-term debt), including full recovery of its depreciation expense (existing plant and the completed project) for the three years following the completion of its proposed construction project. Include all calculations,

assumptions (customer growth and increases in operating expenses), and workpapers used by Levee Road Water in its response.

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED \_\_\_\_JAN 28 2021

cc: Parties of Record

\*Brenda Murphy Secretary/treasurer Levee Road Water Association, Inc. 4681 Levee Road Mt. Sterling, KY 40353

\*Levee Road Water Association, Inc. 4969 Levee Road P. O. Box 770 Mt. Sterling, KY 40353

\*Mark Upton P.E.

\*Honorable W. Randall Jones Attorney at Law Rubin & Hays Kentucky Home Trust Building 450 South Third Street Louisville, KENTUCKY 40202