

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF GREEN-	)	CASE NO.
TAYLOR WATER DISTRICT FOR A RATE	)	2022-00246
ADJUSTMENT PURSUANT TO 807 KAR 5:076	)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO GREEN-TAYLOR WATER DISTRICT

Green-Taylor Water District (Green-Taylor District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on November 15, 2022. The Commission directs Green-Taylor District to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Green-Taylor District shall make timely amendment to any prior response if Green-Taylor 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 Green-Taylor District fails or refuses to furnish all or part of the requested information, Green-Taylor 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, Green-Taylor 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. Refer to Green-Taylor District's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 2. Provide the Cann-Tech, LLC invoices to support the final payment of \$29,249.80 that was paid by Green-Taylor District to Cann-Tech, LLC for construction projects that were completed in calendar years 2019 and 2020.

2. Refer to Green-Taylor District's response to Staff's Second Request, Item 3.b., Excel Workbook: GT2\_3.b-Current\_Employees.xlsx. In its Excel Workbook,

Green-Taylor District explained that Dylan Patterson's operator position will be filled by the end of November.

a. If Green-Taylor District has hired the replacement operator, provide the date on which the replacement operator was hired, and the actual hourly wage rate. In Green-Taylor District's response, provide a description of all employee benefits, other than salaries and wages, that the new operator will receive.

b. If Green-Taylor District has not yet hired its new operator, provide documentation to support Green-Taylor District's expected employee hire date.

3. Refer to Green-Taylor District's response to Commission Staff's First Request for Information (Staff's First Request), Item 1.g., Excel Workbook: GT1\_1.g-Empl\_Health\_Ins.xlsx. Refer also to Green-Taylor District's response to Staff's Second Request, Item 4.

a. Confirm that Green-Taylor District's employees that elected to receive health insurance benefits in calendar year 2022 receive either Family, Employee/Spouse, or Parent Plus. If this cannot be confirmed, identify the employee that elected to receive single health insurance coverage.

b. Provide a copy of Green-Taylor District's employee health insurance invoice for the month of October 2022.

4. Refer to Green-Taylor District's response to Staff's Second Request, Item 6. Provide a detailed explanation as to why the credit card company charges recorded by Green-Taylor District exceed the amount of revenue collected from its customers for these services.

5. Refer to Green-Taylor District's response to Staff's First Request, Item 8 and to Green-Taylor District's response to Staff's Second Request, Item 1.

a. Reconcile the service charges stated in response to Item 8 of \$6,050, and in response to Item 1 of \$56,166.

b. Reconcile the reconnect fees stated in response to Item 8 of \$52,650, and in response to Item 1 of \$19,490.

c. Reconcile the returned check charge stated in response to Item 8 of \$540, and in response to Item 1 of \$345.

d. Reconcile the total nonrecurring charges stated in response to Item 8 of \$126,823, and in response to Item 1 of \$98,316.



Linda C. Bridwell, PE  
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Public Service Commission  
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DATED NOV 08 2022

cc: Parties of Record

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