

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MOUNTAIN)	CASE NO.
WATER DISTRICT FOR A GENERAL)	2022-00366
ADJUSTMENT OF WATER RATES)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO MOUNTAIN WATER DISTRICT

Mountain Water District (Mountain District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on July 14, 2023. The Commission directs Mountain District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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.

Mountain District shall make timely amendment to any prior response if Mountain District obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Mountain District fails or refuses to furnish all or part of the requested information, Mountain 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 and scanned 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, Mountain 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 the Application, Exhibit 6, Schedule of Adjusted Operations References, Adjustment H. Confirm all the temporary employees hired during the test year worked exclusively for the water division. If not, provide the allocation percentages between the water and sewer divisions.

2. Refer to the Application, Exhibit 6, Schedule of Adjusted Operations References, Adjustment I. Provide the latest invoice received for Liability Insurance Expense.

3. Refer to the Application, Exhibit 6, Schedule of Adjusted Operations References, Adjustment J. Provide the latest invoice received for Workers' Compensation Expense.

4. Refer to the Application, Exhibit 9, Usage and Revenue Data.

- a. Provide the usage data by customer classifications.
- b. Provide the minimum bill data by customer classifications without usage included, this should be the meter charge only.
- c. Provide the minimum bill data by customer classifications without the meter charge included, this should be the usage data only of the minimum bill.

5. Refer to the Application, Exhibit 20, Proposed Water Infrastructure Improvement Surcharge. Items 1–6 propose a “System Wide Customer Service Line Replacement,” with replacement of 750 service lines per year for 3 years. Provide further details regarding Mountain District’s proposed replacement of the service lines, including confirmation that Mountain Water is proposing only to replace service lines from its main water line to the customers’ meters.



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Public Service Commission
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DATED JUL 05 2023

cc: Parties of Record

Case No. 2022-00366

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