

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF GREEN RIVER)	CASE NO.
VALLEY WATER DISTRICT FOR ADJUSTMENT)	2023-00088
OF RATES)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO GREEN RIVER VALLEY WATER DISTRICT

Green River Valley Water District (Green River Valley 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 Green River Valley 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.

Green River Valley District shall make timely amendment to any prior response if Green River Valley 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 Green River Valley District fails or refuses to furnish all or part of the requested information, Green River Valley 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, Green River Valley 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, paragraph 5, which states that, "As of the end of the proposed *test period*, December 31, 2021." Then in paragraph 34, the discussion is concerning annual operating budgets for the fiscal year ending June 30, 2022, and June 30, 2023.

a. Explain the intent of Green River Valley of the conflicting statements discussed above regarding the test year for this case.

b. Explain these varied references throughout the application and attached exhibits.

c. Confirm the test year for this application for a rate adjustment is the calendar year of 2021, beginning January 1, 2021, and ending December 31, 2021.

2. Refer to the Application, Exhibit 24, Post-Test Period Customers and Their Effect on Revenue.

a. Explain if this information has been included in the data provided in the revenues and expenses of this case.

b. If they have not, explain the inclusion of this exhibit.

(1) Explain why this information was not included in the test year information throughout the application.

(2) Explain if there is an impact on the rates if the information in this exhibit was not included in the revenues and expenses in this case.

3. Refer to the response to Commission Staff's Second Request for Information (Staff's Second Request), Item 2a. The response refers to Attachment 2a, which is a list of items and at the end of these items is a total for the Columns, DR and CR. The total for CR is reduced by the total of DR for a calculation of \$2,934.24 or \$2,934.

a. Provide an explanation as to the Miscellaneous Service Revenues that account for the amount of \$2,934.24.

b. Provide a list of Miscellaneous Service Revenues that are included in the total amount of \$2,934.24 and the associated revenues for each of the Miscellaneous Service Revenues that make up the total amount.

4. Refer to the response to Commission Staff's First Request for Information (Staff's First Request), Item 32, Attachment_32_RateStudyWorkpapers.xlsx, adj tab, Cells O38 and P38. Explain what the Housekeeping salaries include, and why it is not included with the remaining salaries and wage calculations.

5. Refer to the Application Exhibit 8, Schedule of Adjusted Operations, References, adjustment G, Transportation Expenses. Provide a copy of the 2022 invoices from vendors for Transportation Expense.

6. Refer to the response to Staff's Second Request, Item 2b. The response refers to Attachment 1a. In Attachment 1a, the stated total amount received by Green River Valley District for Sewer Billing and Collecting is \$4,884.50. The amount listed in Item 2b of \$25,512, less the \$4,884.50 stated in Attachment 1a, leaves a difference of \$17,627.50 unexplained. Provide an explanation as to the amount of \$17,627.50 remaining for Other Water Revenues, and include an itemization for this remaining amount.

7. Provide the following information concerning the costs for the preparation of this case:

a. A detailed schedule of expenses incurred to date for the following categories:

- (1) Accounting;
- (2) Engineering;
- (3) Legal;
- (4) Consultants; and
- (5) Other Expenses (Identify separately).

b. For each category identified in Item 7.a., the schedule should include the date of each transaction, check number or other document reference, the vendor, the hours worked, the rates per hour, amount, a description of the services performed, and the account number in which the expenditure was recorded. Provide copies of contracts or other documentation that support charges incurred in the preparation of this case. Identify any costs incurred for this case that occurred during the test year.

c. An itemized estimate of the total cost to be incurred for this case. Expenses should be broken down into the same categories as identified in Item 7.a., with an estimate of the hours to be worked and the rates per hour. Include a detailed explanation of how the estimate was determined, along with all supporting workpapers and calculations.

d. Provide monthly updates of the actual costs incurred in conjunction with this rate case, reported in the manner requested in Items 7.a. and 7.b., and a cumulative total of cost incurred to date for each category. Updates will be due when the utility files its monthly financial statements with the Commission, through the month of the public hearing.

8. Refer to the response to Staff's Second Request, Item 1b; and the Application, Exhibit 12, Statement of Adjusted Operations. In the application, Statement of Adjusted Operations, Employee Pensions and Benefits for 2021 is \$388,683, but in response to Staff's Second Request, Item 1b, Attachment 1b at page 6 lists the period activity total as \$359,803.23. Explain and reconcile the \$28,879.77 difference.

9. Refer to the response to Staff's First Request, Item 1a, Attachment_1a_TrialBalanceReports.xls; response to Staff's Second Request, Item 1c.

Account # 00610-1000 Purchased Water. In the response to Item 1a, Attachment_1a_TrialBalanceReports, Period Activity for 2021 is \$6,569.93, but the response to Staff's Second Request, Item 1c, Attachment 1c lists the period activity total as \$6,554.43. Explain and reconcile the difference.

10. Refer to the response to Staff's First Request, Item 1a, Attachment_1a_TrialBalanceReports.xls; response to Staff's Second Request, Item 1d. Account # 00620-1000 Materials and Supplies Expense. In the response to Item 1a, Attachment_1a_TrialBalanceReports, Period Activity for 2021 is \$23,036.74, but the response to Staff's Second Request, Item 1d, Attachment 1d at page 2 of 6 lists the period activity total as \$22,716.75. Explain and reconcile the difference.

11. Refer to the response to Staff's First Request, Item 1a, Attachment_1a_TrialBalanceReports.xls; response to Staff's Second Request, Item 1d. Account # 00620-8000 Mat. & Supplies Admins & General. In the response to Item 1a, Attachment_1a_TrialBalanceReports, Period Activity for 2021 is \$16,703.50, but the response to Staff's Second Request, Item 1d, Attachment 1d at page 6 of 6 lists the period activity total as \$16,323.12. Explain and reconcile the difference.

12. Refer to the response to Staff's First Request, Item 1a, Attachment_1a_TrialBalanceReports.xls; response to Staff's Second Request, Item 1e. Account # 00633-8000 Cont. Ser. A&g Legal. In the response to Item 1a, Attachment_1a_TrialBalanceReports, Period Activity for 2021 is \$18,576.31, but the response to Staff's Second Request, Item 1e, Attachment 1e lists the period activity total as \$17,961.31. Explain and reconcile the difference.

13. Refer to the response to Staff's First Request, Item 1a, Attachment_1a_TrialBalanceReports.xls; response to Staff's Second Request, Item 1f. Account # 00650-6000 Trans. Exp. T&d. In the response to Item 1a, Attachment_1a_TrialBalanceReports, Period Activity for 2021 is \$155,758.74, but the response to Staff's Second Request, Item 1f, Attachment 1f at page 1 of 2 lists the period activity total as \$154,501.80. Explain and reconcile the difference.

14. Refer to the response to Staff's First Request, Item 1a, Attachment_1a_TrialBalanceReports.xls; response to Staff's Second Request, Item 1h. Account # 00675-8000 Misc. Adminst. & General. In the response to Item 1a, Attachment_1a_TrialBalanceReports, Period Activity for 2021 is \$44,625.23, but the response to Staff's Second Request, Item 1h, Attachment 1h at page 4 of 84 lists the period activity total as \$42,755.23. Explain and reconcile the difference.

15. Refer to the Application, Exhibit 12, Statement of Adjusted Operations, and Exhibit 15, Depreciation Schedule, and Exhibit 16, Depreciation Expense Adjustment. Provide a copy of the Depreciation Schedule for the test period of January 1, 2021 to December 31, 2021.

16. Refer to the Application, Exhibit 12, Statement of Adjusted Operations, References, Adjustment F. Provide a monthly breakdown in both Kwh and dollar amount, of power purchased during the test year by vendor, identifying all vendors from whom Green River Valley purchased power.

17. Provide the current rate charged by each vendor from whom Green River Valley purchases power.

18. Refer to the Application, Exhibit 12, Statement of Adjusted Operations, References, Adjustment G. Provide a monthly breakdown in both volumes or weights and dollar amount, of all chemicals purchased during the test year by vendor, identifying all vendors from whom Green River Valley purchased chemicals.

19. Provide the current rate paid for each chemical charged by each vendor from whom Green River Valley purchases chemicals.

20. Refer to the response to Staff's First Request, Item 32, Attachment_32_RateStudyWorkpapers.xlsx, adj tab, Cells B34, B35 and B36. Provide Account # 00604-0000 Flex Administrator – Reimbursement amount for calendar years 2018 and 2022.

21. Refer to the Application, Exhibit 16, Depreciation Expense Adjustments Table, The New Water Treatment plant project. Confirm the date the project was completed and placed in service. If not in service, provide when the project is expected to be completed.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED JUN 30 2023

cc: Parties of Record

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