

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MONROE)	
COUNTY WATER DISTRICT FOR RATE)	CASE NO. 2017-00070
ADJUSTMENT PURSUANT TO 807 KAR 5:076)	

ATTORNEY GENERAL’S INITIAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Data Requests for Information to Monroe County Water District (“District”) to be answered within twenty-one (21) days of service as required by 807 KAR 5:076(10)(c), and in accord with the following instructions:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness(es) who will be prepared to answer questions concerning each request.
- (3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for Joint Applicants with an electronic version of these data requests, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, please request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard

notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,

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ATTORNEY GENERAL



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1. Refer to the Application, Tab 1, Reasons for Application. The District's explanation for the proposed increase of several non-recurring charges is a significant increase in the cost of providing those services since the last adjustment to non-recurring charges. Describe the source, and thus justification, of the increased cost of providing the services covered by non-recurring charges.
2. Refer to the Application, Tab 24, Comparison of Water District Wages. Provide copies of the referenced studies.
3. Refer to the Application, Tab 28, Calculation of Average Labor Cost. In calculating average labor costs for Operations and Administration, the District uses the hourly wage of all employees including managers to determine the cost of labor in non-recurring charges.
 - a. Provide the District's justification for using the average hourly wage of all employees as the basis for cost-justification of non-recurring charges, including the reasonableness of assuming that managers are equally likely to perform services covered by non-recurring charges.
 - b. Provide all documentation supporting the justification provided in (a) above..
4. Refer to the Application, Tab 29 and Tab 30, Connection Fee/Turn-on Charge and Connection Fee/Turn-On Charge (After Hours). Explain why these charges require significantly more Clerical and Office Labor than other non-recurring charges.
5. Refer to the Application, Tab 33, Meter Relocation Charge.
 - a. Confirm that "Installation Equipment" does not include any items listed under "Field Expense Materials."
 - b. Describe how the average cost of "Installation Equipment" is calculated.
6. Refer to the Application, Tab 36, Reconnection Charge. The District's tariff allows collection of the cost of disconnect in the same non-recurring charge that covers reconnection. Confirm that customers are not charged for a previous tenant or owner's disconnection.
7. Refer to the Application, Tabs 30, 37, and 40, dealing with After Hours service. The District uses overtime average labor costs for both Field Labor Expense and Clerical and Office Labor Expense.
 - a. Explain why field work performed outside of regular business hours is assumed to require overtime rather than an adjustment to work schedules, and provide documentation for overtime required to perform that work.

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- b. Explain why the clerical work corresponding with field work performed outside of regular maintenance hours must also be performed outside of regular business hours.
- c. If the answer to (b), above, is that clerical work for field work performed outside of regular maintenance hours must also be performed outside of regular business hours, provide documentation for the overtime required to perform that work.