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November 20, 2014

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COMMISSION

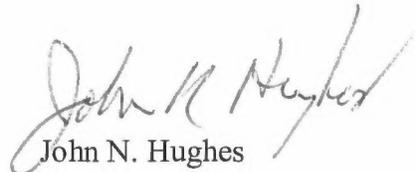
Jeff Derouen
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: Case No. 2014-00342

Dear Mr. Derouen:

Mountain Water District submits its responses to the Commission's order of October 13, 2014, consisting of the original and ten copies of seven volumes each.

I certify that I am the attorney supervising the preparation of these Responses on behalf of the Mountain Water District and that the Responses and attachments are true and accurate to the best of my knowledge, information and belief formed after reasonable inquiry with the witnesses providing the information and documents.



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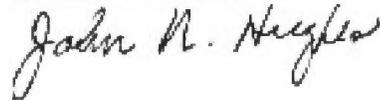
COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF MOUNTAIN)
WATER DISTRICT FOR) Case No. 2014-00342
AN ADJUSTMENT OF WATER AND)
SEWER RATES)

RESPONSES TO ORDER OF OCTOBER 13, 2014

SUBMITTED BY:



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and

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Attorneys for Mountain
Water District

1. Provide the minutes of the meeting of Pike County Fiscal Court at which the current salary level for members of Mountain District's Board of Commissioners was approved.

Witness: Sawyers

Response: Attached

2. a. Provide a complete copy of the workpapers, calculations, and assumptions Mountain District used to develop its pro forma test-year financial information.

b. Provide the workpapers, calculations, and assumptions requested in Item 2(a) in Microsoft Excel format.

Witness: Spears

Response: Attached

3. a. Confirm that Utility Management Group LLC ("UMG") is providing operational, maintenance, and management services to Mountain District for its water and wastewater divisions. Provide the date(s) UMG began providing these services to Mountain District.

b. Provide the minutes of the meetings of Mountain District's Board of Commissioners wherein the UMG contract is discussed, approved, or renewed.

c. Provide a copy of the original Agreement between Mountain District and UMG and each subsequent Agreement.

d. Provide a schedule comparing the UMG contract costs broken down by major functions for the calendar years 2005 through 2014.

Witness: Sawyers

Response: Attached

4. Provide all internal memoranda, correspondence, electronic mail messages and other documents in which Mountain District officials analyzed, reviewed, or discussed the contract negotiations with UMG.

Witness: Sawyers

Response: Attached

5. List each of Mountain District's non-regulated business activities. For each activity, describe the accounting policies and procedures that ensure that Mountain District's regulated rates do not subsidize the activity.

Witness: Sawyers

Response: Attached

6. a. Provide a schedule listing each project included in the test-year Construction Work in Progress ("CVVIP") for Mountain District's water division. Include a detailed description of each project included in the schedule.

b. Provide a schedule listing each project included in the test-year Construction Work in Progress ("CVVIP") for Mountain District's sewer division. Include a detailed description of each project included in the schedule.

Witness: Spears

Response: Attached

7. a. Provide a test-year general ledger for Mountain District's water division showing account number, subaccount number, account title, subaccount title, and all entries to each account. For each entry, state the date paid, vendor name, check number used to make payment and the amount. The general ledger shall include all asset, liability, capital, income, and expense accounts that Mountain District uses. All accounts should show activity for 12 months. Show the balance in each control and all underlying subaccounts per company books.

b. Provide a test-year general ledger for Mountain District's sewer division showing account number, subaccount number, account title, subaccount title, and all entries to each account. For each entry, state the date paid, vendor name, check number used to make payment and the amount. The general ledger shall include all asset, liability, capital, income, and expense accounts that Mountain District uses. All accounts should show activity for 12 months. Show the balance in each control and all underlying subaccounts per company books.

c. Provide the general ledger requested in Item 7(a) and 7(b) in Microsoft Excel format.

Witness: Spears

Response: Attached

8. a. For each cash account that Mountain District used during the test year for its water division, provide a cash disbursements ledger that lists all checks in chronological order and details the date paid, check number, vendor, and amount.

b. For each cash account that Mountain District used during the test year for its sewer division, provide a cash disbursements ledger that lists all checks in chronological order and details the date paid, check number, vendor, and amount.

c. Provide the cash disbursement ledgers requested in Item 8(a) and 8(b) in Microsoft Excel format.

Witness: Spears

Response: Attached

9. Provide a copy of all audit adjustments made for the test-year financial statements.

Witness: Spears

Response: Attached

10. Provide for each employee salary increase granted in calendar years 2012, 2013, and 2014 the minutes of each meeting of Mountain District's Board of Commissioners in which the salary increase was discussed and/or approved.

Witness: Sawyers

Response: Attached

11. a. List all employees employed during the test year. For each employee listed, provide his or her:

- (1) Name;
- (2) Title;
- (3) Length of employment with Mountain District;
- (4) Job duties;
- (5) Test-year pay rate and current pay rate;
- (6) Test-year regular time worked and overtime worked,
- (7) Percentage of test-year payroll capitalized; and
- (8) Types of employee benefits provided (e.g., health insurance,

dental insurance, vision insurance, pension, etc.) and Mountain District's contribution.

b. Provide the employee information requested in Item 11(a) in Microsoft Excel format.

c. Provide all calculations used to develop the percentage of test-year payroll capitalized.

Witness: Sawyers/Spears

Response: Attached

12. Provide the employer retirement contribution rate(s) that became effective on July 1 of calendar years 2011, 2012, and 2013.

Witness: Sawyers/Spears

Response: Attached

13. a. Identify any employees listed in the response to Item 11(a) who are no longer Mountain District employees.

b. For the position of each former employee identified in the response to Item 13(a):

(1) If the position has been filled, identify the employee currently in the position, provide the date on which the employee was hired, the actual annualized salary and the actual benefit information. Identify the salary and employee benefit costs that are included in Mountain District's pro forma operating expenses.

(2) If the position is still vacant, state the reason(s) why the position is vacant or whether Mountain District does not intend to fill it.

(3) If the position will be filled, state the current status of Mountain District's efforts to fill the position and the anticipated hire date.

(4) State whether the cost of the position is included in the pro forma salaries and wage expense. If the cost is included, state separately the position costs that are included in the test-year operating expenses (e.g., payroll expenses, payroll capitalized, retirement, payroll taxes, insurance benefits) and the accounts to which each amount was charged.

Witness: Sawyers

Response: Attached

14. Provide a detailed list of all fringe benefits available to Mountain District employees and the actual test-year cost of each benefit and the pro forma cost. Provide comparative cost information for calendar years 2012 and 2013. Indicate which fringe benefits, if any, are limited to management or full-time employees. Explain any changes in fringe benefits occurring over this two-year period.

Witness: Sawyers

Response: Attached

15. Provide the most recent vendor invoice for the following employee

insurance coverages:

- a. Health Insurance;
- b. Dental Insurance; and,
- c. Life Insurance.

List employees individually by name and state clearly the type of coverage provided. If the listing identifies employees by a code number, provide the name for each number.

Witness: Sawyers

Response: Attached

16. a. Provide a schedule that details all test-year and post test-year expenditures related to the current proceeding, along with a copy of vendor invoices. The schedule should state the nature and amounts of all charges. The invoices should contain detailed descriptions of the services, the amount of time billed for each service, and the hourly billing rate. Identify the account number and title to which each amount was charged.

b. Provide the anticipated total cost of the case upon completion. The projected amount should be detailed by type of service and vendor with supporting documentation for each.

c. Provide a monthly update of the schedule requested in Item 16(a) showing all of the costs incurred as of that date. Include the supporting detailed vendor invoices as requested in Item 16(a).

Witness: Spears

Response: Attached

17. For each long-term debt reported by Mountain District's water division that is currently outstanding or was outstanding during the test year, provide:

- a. A description of the use of the borrowed funds;
- b. A copy of the bond ordinance or loan agreement; and
- c. A current amortization schedule that includes the entire life of the long-term debt and that details the payment amounts, principal retirements, interest payments, interest rates, and outstanding balances.

Witness: Spears

Response: Attached

18. Identify the Commission proceeding wherein Mountain District was authorized to issue each long-term debt for its water division.

Witness: Spears

Response: Attached

19. For each long-term debt reported by Mountain District's sewer division that is currently outstanding or was outstanding during the test year, provide:

- a. A description of the use of the borrowed funds.
- b. A copy of the bond ordinance or loan agreement.
- c. A current amortization schedule that includes the entire life of the long-term debt and that details the payment amounts, principal retirements, interest payments, interest rates, and outstanding balances.

Witness: Spears

Response: Attached

20. Identify the Commission proceeding wherein Mountain District was authorized to issue each long-term debt for its sewer division.

Witness: Spears/Sawyers

Response: Attached

21. Provide an electronic version of the cost-of-service study filed with Mountain District's application in Microsoft Excel format. All formulas contained in the electronic version should be self-contained and without any linked references to or macro commands involving external files.

Witness: Howard

Response: Attached

22. State whether Mountain District has established a code of ethics for its commissioners or employees. If so, provide a copy.

Witness: Sawyers

Response: Attached

23. State whether, in the period from January 1, 2005, to September 30, 2014, Mountain District conducted any transactions with any entity that is owned by or employs a member of Mountain District's Board of Commissioners, an officer of Mountain District, or a relative of a member of Mountain District's Board of Commissioners or a Mountain District officer. If so, describe each transaction, identify the entity with whom Mountain District engaged in the transaction, and the Mountain District commissioner or officer involved. State whether the Mountain District commissioner or officer involved participated in the decision.

Witness: Sawyers

Response: Attached

24. State whether Mountain District has an asset-management plan for its water division. If so, provide a copy for the plan.

Witness: Sawyers

Response: Attached

25. State whether Mountain District has an asset management plan for its sewer division. If so, provide a copy of the plan.

Witness: Sawyers

Response: Attached

26. a. Identify the electric utilities that serve Mountain District's water facilities.

b. Provide the monthly bills that were rendered to Mountain District during the test period for electric service to its water facilities.

c. State the rate schedule(s) under which the electric utilities provide electric service to Mountain District's water facilities. If service is provided under more than one rate schedule, list for each rate schedule the facilities that are served under that rate schedule.

Witness: Sawyers

Response: Attached

27. a. Identify the electric utilities that serve Mountain District's sewer facilities.

b. Provide the monthly bills that were rendered to Mountain District during the test period for electric service to its sewer facilities.

c. State the rate schedule(s) under which the electric utilities provide electric service to Mountain District's sewer facilities. If service is provided under more than one rate schedule, list for each rate schedule the facilities that are served under that rate schedule.

Witness: Sawyers

Response: Attached

28. List and describe all actions that Mountain District has taken and the programs that it has implemented to minimize purchased-power expenses and improve energy efficiency at its water facilities.

Witness: Sawyers

Response: Attached

29. List and describe all actions that Mountain District has taken and the programs that it has implemented to minimize purchased-power expenses and improve energy efficiency at its sewer facilities.

Witness: Sawyers

Response: Attached

30. Provide a copy of Mountain District's current written policies, programs, or procedures, if any, to promote the general conservation of water and to reduce unaccounted-for water loss at its water division.

Witness: Sawyers

Response Attached

31. Complete the Statement of Disclosure of Related Party Transactions Form that is attached to this request.

Witness: Sawyers

Response: Attached

32. a. State whether Mountain District has conducted or commissioned any studies, audits, or reviews of its management and operation practices since the management audit was conducted in Case No. 96-126.¹

b. If so,

(1) Provide a copy of the findings of each study, audit and review.

(2) Describe the actions that Mountain District has taken on the findings and recommendations of each study, audit and review.

Witness: Sawyers

Response: Attached