

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JAN 12 2015
PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF MOUNTAIN WATER)
DISTRICT FOR AN ADJUSTMENT OF WATER)
AND SEWER RATES) CASE NO: 2014-00342

ATTORNEY GENERAL'S INITIAL REQUESTS FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits the Initial Data Requests for Information to Mountain Water District ("MWD") to be answered by the date specified in the Commission's Order of Procedure, 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 MWD 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.

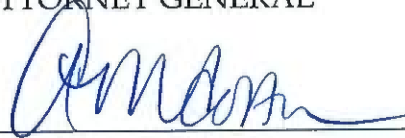
(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(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.

(14) The Attorney General reserves the right to pose additional preliminary data requests on or before the due date specified in the Commission's procedural schedule.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



ANGELA M. GOAD
STEFANIE J. KINGSLEY
JENNIFER BLACK HANS
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE
SUITE 200
FRANKFORT, KY 40601-8204
(502) 696-5453
FAX: (502) 573-1005
Angela.Goad@ky.gov
Stefanie.Kingsley@ky.gov
Jennifer.Hans@ky.gov

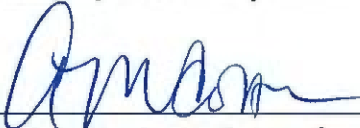
Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Honorable John N. Hughes
Attorney at Law
124 West Todd Street
Frankfort, KY 40601

Daniel P. Stratton
Stratton Law Firm PSC
P.O. Box 1530
Pikeville, KY 41502

this 12th day of January, 2015



Assistant Attorney General

Attorney General's Initial Requests for Information
Application of Mountain Water District For An Adjustment of Water
Case No. 2014-00342

1. Please reference the Mountain Water District ["MWD"] Application generally. Please provide all tables and exhibits referenced in or supporting the Application and testimony in their native electronic format (i.e. Microsoft Word, Microsoft Excel), with data including formulae in all cells and rows fully intact and fully accessible.
 - a. Please provide all relevant and supporting worksheets in electronic format with data including formulae in all cells and rows fully intact and fully accessible.
2. Please reference the MWD Application at p. 2, paragraph 5. As to the statement that MWD's last general rate case was filed in 1997, please explain in detail why MWD did not file a rate case before now with the Commission, which in turn may have allowed for a more gradual rate increases.
3. Please reference the MWD Application at p. 2, paragraph 5. As to the statement that MWD's water and sewer rates were last increased in 2008 and 2006 respectively, pursuant to loan agreements with Rural Development:
 - a. Explain what the original loan agreements covered and why it was necessary to obtain the loans?
 - b. Please explain in detail the water and sewer rate increases that occurred in 2008 and 2006 respectively.
 - c. Identify what specific situation pursuant to the loan agreements caused the rate increases, for example did MWD refinance loans, interest rates increase, etc.?
 - d. Explain whether the rate increases were 100% due to the loan agreement change of terms, or if there were any other reasons for the rate increase.
 - e. Identify for what period of time the increases were effective.

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4. Provide copies of all studies that MWD conducted addressing the impact that the proposed rate design, and rate increase for both water and sewer rates will have on the elderly, low income, fixed income and home bound segments of its ratepayer base. Please provide detailed information for each specified group.
5. Does MWD anticipate any changes in any existing contracts as a result of any change in its rate structure/potential rate increase (e.g., engineering, information technology, maintenance, etc.)?
6. Does MWD maintain any contracts with vendors whose principals are in any manner related, by blood or marriage, to MWD's officers, Water Commissioners, members of its Board, its employees, its independent contractors or consultants? If yes:
 - a. Please provide copies of any such contract, and a breakdown of how much money was spent per contract per year for the last ten (10) calendar years; and
 - b. Please state whether the contracts were awarded pursuant to a sealed bid process, and if so, provide specifics of that bid process.
7. Does MWD have any anti-nepotism policies in place? If so, provide copies of any and all such policies, and/or memoranda referring to such policies.
8. Does MWD employ the relatives of:
 - a. Any MWD board member;
 - b. Any MWD officer;
 - c. Any MWD consultant; and/or
 - d. Any other MWD employee?

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9. If so, please provide specific details. Does Utility Management Group ["UMG"] employ the relatives of:
- a. Any MWD board member;
 - b. Any MWD officer;
 - c. Any MWD consultant; and/or
 - d. Any other MWD employee?

If so, please provide specific details.

10. Has any member of MWD's Board ever served on the Board of any other business entity? If so, please state:
- a. the name and address of each such entity, and the nature of that business; and
 - b. the length of time they served on the other entity's board.
11. Please reference the Application generally. Please state whether MWD intends to seek recovery of any performance bonus expenses, that have been given since the last rate case, for ratemaking purposes of either MWD employees and/or UMG employees, and if so provide the following:
- a. A quantification of the amount of the bonus with the recipient(s) if officers, directors, or management;
 - b. A quantification of how many employees received a performance bonus and the amount of each; and
 - c. A complete justification for recovering such expense.

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12. Please reference Exhibit B-1, Schedule W-A, p. 1 of 1 of the Application.
Please explain in detail why MWD chose the proposed water rate alternate 1 which is an across-the-board rate increase, opposed to the proposed rate alternate 2 which is a cost of service increase.
13. Please reference Exhibit B-1, Schedule W-A, p. 1 of 1 of the Application.
Please confirm that if the proposed rate alternate 2 – cost of service were used, the customer class that would receive the highest percentage change would be the wholesale rates with an increase of 98%.
 - a. Has MWD performed a study or research to determine how its wholesale water rates compare to other wholesale rates in the state of Kentucky? If so, please provide copies of all such studies.
 - b. Please confirm that the other customer classifications are paying higher rates and essentially subsidizing the wholesale customer rates to keep it artificially low. Please explain your answer in detail.
 - c. Has MWD performed a study or research to determine how its rates for the residential, commercial, multi-family, industrial, and public authority classes compare to the rates that the wholesale customers charge to its ratepayers? Please explain your answer in detail.
14. Please reference Exhibit B-2, Schedule W-B, p.1 of 3 of the Application. Please confirm that there were zero (“0”) new water customers added in the test year of 7/1/13 to 6/30/14, even though there have been expansions to the Pikeville Medical Center, University of Pikeville’s College of Osteopathic Medical School, commercial businesses, as well as new apartments and homes being built in the service area.
15. Please reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Please explain why the wholesale water revenues are not included in the revenue section and instead indicates “Incl. in Public Auth.”
16. Please reference the Application generally. How did MWD establish the average water and sewer usage? Please provide any and all data and workpapers used to support this finding, with data in all cells and rows fully intact and fully accessible.

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17. Please reference Exhibit B-2, Schedule W-B, pp. 1 and 2 of 3 of the Application. Please explain the disparity in that MWD does not list any depreciation information under "Expenses" but does list Depreciation expenses on the following page.
18. Please reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Explain what salaries are included under the expenses "Compensation - Administration" for \$124,224. Please provide a full breakdown of what this amount constitutes.
19. Please reference Exhibit B-2 Schedule W-B, p. 1 of 3 of the Application. Please explain what salaries are included under the expenses "Compensation-Commissioners".
 - a. Please explain if the \$30,000 figure is the salary per each MWD Commissioner, or if it is the cumulative salary of all five Commissioners.
 - b. List any and all additional/fringe benefits that are provided to the Commissioners such as vehicles to drive, meals paid for, etc.
20. Reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Please provide a breakdown of expenses listed under "Contract Services - Accounting and Audit" for the figure of \$72,550.
 - a. Did MWD engage in competitive bidding when awarding this contract to ensure that this is the most cost effective option for its customers?
 - i. If so, please provide all documentation pertaining to the competitive bidding process, including but not limited to any and all internal emails, memoranda, and correspondence. If any RFPs were issued, provide any and all documents with such, and identify all parties to whom any RFPs were forwarded.
 - ii. If not, why not? Please explain your answer in detail.
21. Please reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a breakdown of expenses listed under "Contract Services - Legal" for \$39,034.

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- a. Did MWD engage in competitive bidding when awarding this contract to ensure that this is the most cost effective option for its customers?
 - i. If so, please provide all documentation pertaining to the competitive bidding process, including but not limited to any and all internal emails, memoranda, and correspondence. If any RFPs were issued, provide any and all documents with such, and identify all parties to whom any RFPs were forwarded.
 - ii. If not, why not? Please explain your answer in detail.
22. Please reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a breakdown of expenses by category listed under "Contract Services - UMG Management" for \$5,812,426 as well as the pro forma adjustment for \$5,870,550.
- a. Did MWD engage in competitive bidding when awarding this contract to ensure that this is the most cost effective option for its customers?
 - i. If so, please provide all documentation pertaining to the competitive bidding process, including but not limited to any and all internal emails, memoranda, and correspondence. If any RFPs were issued, provide any and all documents with such, and identify all parties to whom any RFPs were forwarded.
 - ii. If not, why not? Please explain your answer in detail.
23. Please reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a breakdown of expenses listed under "Contract Services - R&M" for \$465,864 as well as the pro forma adjustment for \$470,523.
- a. Please explain in full R&M's job duties provided to MWD.
 - b. Did MWD engage in competitive bidding when awarding this contract to ensure that this is the most cost effective option for its customers?
 - i. If so, please provide all documentation pertaining to the competitive bidding process, including but not limited to any and all internal emails, memoranda, and correspondence. If any

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RFPs were issued, provide any and all documents with such,
and identify all parties to whom any RFPs were forwarded.

ii. If not, why not? Please explain your answer in detail.

24. Reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a complete and detailed breakdown of expenses listed under "Contract Services - Assumed Expenses by UMG" for \$350,460 that decreases in the pro forma adjustment by almost \$100,000.
25. Reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a complete and detailed breakdown of expenses listed under "Other Legal PSC Expense" for \$4,918, as well as what jobs were performed. Please also provide the name of the attorney, firm, address that was paid and completed each specific job.
26. Please reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a complete and detailed breakdown of expenses listed under "Contract Services - Legal" for \$39,034.
27. Please reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a complete and detailed breakdown of expenses listed under "Education and Meetings" for \$39,034.
28. Please reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a complete and detailed breakdown of expenses listed under "Settlement Expenses" for \$3,010.
29. Please reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a complete and detailed breakdown of expenses listed under "Bank Service Fees" for \$23,857.
30. Please reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a complete and detailed breakdown of expenses listed under "R&M Overage" for \$20,760.
31. Please reference Exhibit B-2, Schedule W-B, p. 2 of 3 of the Application. Provide a complete and detailed breakdown of expenses as well, as what

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specific items are included, listed under "Office Furniture & Equipment" for \$4,305.

32. Reference Exhibit B-2, Schedule W-B, p. 2 of 3 of the Application. Provide a complete and detailed breakdown of expenses, as well as what specific items are included, listed under "Transportation Equipment" for \$80,481.
33. Reference Exhibit B-2, Schedule W-B, p. 1 of 3 of the Application. Provide a complete and detailed breakdown of expenses, as well as what specific items are included, listed under "Communication Equipment" for \$120,144.
34. Reference Exhibit B-2, Schedule W-B, p. 2 of 3 of the Application. Provide a complete and detailed breakdown of expenses listed under "Other Water Service Revenue" for \$244,741.
35. Please reference Exhibit B-3, Schedule W-G, p. 1 of 1 of the Application. Has MWD conducted any studies/surveys/research to indicate that the water customers can afford a 25.33% increase across the board, when considering the devastating impact of the loss of coal associated jobs in its service area?
36. How do MWD's water and sewer rates compare to rates of water districts similarly situated? If there have been studies and/or research please provide the documentation of such, and provide copies of such studies.
37. Reference Exhibit B-5, Schedule S-B p.1 of 2 of the Application. Please confirm that there were actually zero ("0") new sewer system customers added in the test year of 7/1/13 to 6/30/14.
38. Reference Exhibit B-5, Schedule S-B, p.1 of 2 of the Application. Please provide a detailed list of all sewer customers that includes location, city, and state of each.
39. Reference Exhibit B-4, Cost of Service Allocation Study of the Application. Please explain in detail why MWD chose the proposed sewer rate alternate 1 which is an across the board rate increase opposed to the proposed rate alternate 2 which is a cost of service increase.
40. Please reference Exhibit B-6, Schedule S-D, p. 1 of 1 of the Application. Has MWD conducted any studies/surveys/research to indicate that the sewer

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customers can afford a 159% increase across the board, when considering the devastating impact of the loss of coal associated jobs in its service area?

41. Reference Exhibit B-5, Schedule S-B, p. 1 of 2 of the Application. Provide a complete and detailed breakdown of expenses by category listed under "Contract Services - UMG Management" for \$1,224,408 as well as the pro forma adjustment for \$1,236,652.
 - a. Did MWD engage in competitive bidding when awarding this contract to ensure that this is the most cost effective for its customers?
 - i. If so, please provide all documentation pertaining to the competitive bidding process, including but not limited to any and all internal emails, memoranda, and correspondence. If any RFPs were issued, provide any and all documents with such, and identify all parties to whom any RFPs were forwarded.
 - ii. If not, why not? Please explain your answer in detail.
42. Reference Exhibit B-5, Schedule S-B, p. 1 of 2 of the Application. Provide a complete and detailed breakdown of expenses listed under "Contract Services - R&M" for \$98,136 as well as the pro forma adjustment for \$99,117.
 - a. Please explain in full R&M's job duties provided to MWD.
 - b. Did MWD engage in competitive bidding when awarding this contract to ensure that this is the most cost effective for its customers?
 - i. If so, please provide all documentation pertaining to the competitive bidding process, including but not limited to any and all internal emails, memoranda, and correspondence. If any RFPs were issued, provide any and all documents with such, and identify all parties to whom any RFPs were forwarded.
 - ii. If not, why not? Please explain your answer in detail.
43. Reference Exhibit B-5, Schedule S-B, p. 1 of 2 of the Application. Provide a complete and detailed breakdown of expenses listed under "Contract Services - Assumed Expenses by UMG" for \$73,830.

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44. Please reference Exhibit B-5, Schedule S-B, p. 1 of 2 of the Application. Provide a complete and detailed breakdown of expenses listed under "R&M Overage" for \$213,168.
45. Please reference Exhibit B, Appendix C of the Application. Provide the specific number of employees that UMG employs that work exclusively for MWD pursuant to the Agreement for Operations, Maintenance and Management Services.
 - a. Provide all salaries, benefits, overtime pay, etc. for each employee.
 - b. What other entities does UMG perform work for?
46. Please reference the Testimony of Kevin Howard, Question 9, where he states that the existing rate system (alternate 1) has been in place for well over a decade, and is accepted and understood by the customers. Please explain what rate systems were in place prior to alternate 1.
47. Reference the Testimony of Kevin Howard, Question 10 where he states that the District did not have a demand study that would compare peaks between customer classes so he relied upon a Power Point presentation from a Mr. Pitt in Alabama.
 - a. Is this unusual for a Water District to not have a demand study to compare peaks between customer classes?
 - b. Did you advise the Water District that such a study should be performed to accurately produce the cost of service study?
 - c. Do you believe the cost of service study is skewed due to the lack of the peak demand study?
 - d. Explain why a Kentucky resource was not utilized instead of relying upon a Power Point presentation that was given in Alabama?
 - e. Please explain why the Power Point presentation should be afforded any evidentiary weight?

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48. Please reference the Testimony of Kevin Howard, Question 16, where he explains that the UMG contract anticipates a 1% increase in calendar 2015.
- a. What are all known future increases in the UMG base contract and the UMG repair and maintenance (R&M) contract?
 - b. List the increases or decreases to the UMG base contract and the UMG repair and maintenance (R&M) contract that MWD has paid for the last ten (10) years.
49. Reference the Testimony of Kevin Howard, Question 16 where he states that a 3% electric rate increase was adjusted due to an anticipated increase in AEP electric rates. Mr. Howard further contends that the District requested that AEP provide an estimate of the anticipated impact on its annual electric costs, but MWD did not receive the study and merely assumed that the rate increase would be 3% next year.
- a. Please provide the resources MWD utilized in order to assume that there would be a 3% electric rate increase.
 - b. Should MWD use an assumed electric rate increase in its Application, instead of waiting for the more specific actual electric rate increase?
 - c. Does MWD believe it is an accepted practice to use forecasted expenses in a historic test year rate application filing? If so, please provide examples, and explain the answer in detail.
50. Reference the Testimony of Kevin Howard, Question 17 where he states that MWD does not have audited financials for UMG. Please explain in detail why UMG does not provide audited financials for MWD's review.
51. Please reference the Testimony of Roy Sawyers p.1, lines 15-18 where he states that part of his job duties are to plan, organize, and evaluate the work of all District departments. Please list in detail all of the MWD departments that Roy Sawyers oversees.
52. Please reference the Testimony of Roy Sawyers p. 2, line 15 where he states that in addition to himself the MWD only employs one other employee. Please provide the name of the employee, job title, salary, overtime pay,

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whether a vehicle is provided, cell phone provided, and/or any other benefits.

53. Please provide the salary, overtime pay, whether a vehicle is provided, cell phone provided, and/or any other benefits for Roy Sawyer in his position of District Administrator.
54. Please reference the Testimony of Roy Sawyer on p.2, lines 21-22 where he explains that the contract with UMG expires in December 2016. Explain whether MWD intends to open up a competitive bidding process for the next operation and management contract in order to obtain value for its ratepayers.
55. Please list the salaries and raises of the MWD employees for the past ten (10) years.
56. Please list the salaries and raises of the UMG employees for the past ten (10) years.
57. Reference the Testimony of Michael Spears, Question 7 where he states that the District does not audit the financial information provided by UMG, nor does it have the financials audited.
 - a. Why does MWD not audit the financial information provided by UMG?
 - b. Would it not be advisable for MWD to audit the financial information provided by UMG since it represents the large bulk of the revenue requirement?
 - c. As a CPA, did you advise MWD to audit the financial information provided by UMG?
58. Please reference the Testimony of Michael Spears, Question 14 where he is asked if he has considered the impact of the proposed rates and the effect on the District's financial condition. Has MWD considered the impact of the proposed rates and the effect on the ratepayer's financial condition?

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59. Please reference the Application generally. What is the estimated annual amount of water loss on MWD's system for the past ten (10) years in percentage form and in gallons?
- a. How much of the water loss is allocated to each customer class?
60. Reference the Application generally. What specific steps has MWD taken to limit the amount of water loss?
61. Please reference the Application generally.
- a. Have MWD and/or UMG received complaints concerning lack of sewer pipe access by residents in its service area, since a large majority of people must still rely upon septic tanks?
 - b. Has MWD and/or UMG received complaints concerning any issues associated with the wastewater treatment plans such as foul odors being emitted, air quality, noise, etc.?
 - c. Does MWD and/or UMG have a system in place that keeps track of ratepayer/consumer complaints?
62. Please reference the Application generally. What types of pipeline are currently being used by MWD/UMG, for example clay, steel, etc.? Please also provide a breakdown of how many miles each type of pipe is used.
63. Please see generally, the Examination of Certain Policies, Procedures, Controls, and Financial Activity of Mountain Water District, hereinafter, the "Audit Report," performed by Crit Luallen, Auditor of Public Accounts, Commonwealth of Kentucky, transmitted to Mountain Water District on January 27, 2011. Please provide detailed answers to the following:
- a. When was the Audit Report Received?
 - b. What action was taken upon receipt of the Audit Report?
 - c. Please provide minutes of Mountain District's Board of Commissioner's meeting where the Audit Report was discussed.

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64. Please see generally the Audit Report, and explain which of the State Auditor's recommendations, made upon Findings 1-8, that were implemented by Mountain Water District and which recommendations were not implemented. If the State Auditor's recommendations were not implemented in regards to a particular Finding, please explain whether or not MWD took other action to address the issues raised.
65. Please describe any further action that was taken by MWD outside that sixty day window to implement additional Recommendations of the Audit Report, and describe why those particular Recommendations were implemented outside sixty days.
66. Please describe any construction project from 2005-2009 that received funding from a federal agency that precipitated a surcharge or rate increase to the ratepayers pursuant to KRS 278.023(1). Please provide:
 - a. The federal agency that funded the project.
 - b. A summary of the work conducted under the construction project.
 - c. The dollar amount of the project estimate; and actual costs upon completion of project.
 - d. Whether MWD or another contractor conducted the work on the project funded by the federal agency.
 - e. Total surcharge or rate increase levied against the ratepayers.
 - f. Period of time for which the surcharge was/is applied.
67. Please explain why the Board of Commissioners of MWD unanimously voted to terminate the contract of UMG on October 29, 2008?
 - a. What other contractors were considered for operational and management services by the Board of Commissioners after the vote to terminate UMG's contract was held?

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68. Please provide any correspondence, written or electronic, between MWD and UMG after the January 27, 2011 that specifically discusses the Audit Report and the Findings as they relate to UMG, and failure to provide financials.
69. Please describe the facts and circumstances surrounding the July 30, 2008 request for Legal Counsel of Mountain Water District to review the contract with UMG, with specific attention to why there was a need to renegotiate a five year contract that was well into its third year.
70. Please describe the facts and circumstances surrounding the July 30, 2008 request for Legal Counsel of Mountain Water District to review the contract with UMG, with specific attention to why there was a need to renegotiate a five year contract that was well into its third year.