

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TARIFF FILING OF MARTIN COUNTY WATER)
DISTRICT TO IMPLEMENT A NEW NON-)
RECURRING CHARGE, DISCONTINUE CERTAIN)
EXISTING NON-RECURRING CHARGES, AND) CASE NO. 2015-00005
INCREASE CERTAIN EXISTING NON-)
RECURRING CHARGES)

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO MARTIN COUNTY WATER DISTRICT

Martin County Water District ("Martin County"), pursuant to 807 KAR 5:001, is to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 15 days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response 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 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.

Martin County shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Martin County fails or refuses to furnish all or part of the requested information, Martin County shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure 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 filing a document containing personal information, Martin County shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to Martin County's response to Staff's Initial Request for Information ("Staff's Initial Request"), Item 1. Is the November 2014 meeting of Martin County's Board of Commissioners the only meeting in which the proposed nonrecurring charges were discussed?

2. Refer to Martin County's response to Staff's Initial Request, Item 4. Identify the manufacturer, model, and type of the 30 meters currently in inventory.

3. State the cost differential between individual and bulk purchases of the Sensus AMR meters.

4. Refer to Martin County's response to Staff's Initial Request, Item 8.
a. Provide the invoices relating to the completion of the partial AMR meter conversion in 2009.

b. State whether there are any Sensus AMR meter vendors, other than C.I. Thornburg Co, Inc., within the region or the country from which Martin County could have purchased similar meters.

c. Provide details regarding whether Martin County solicited any Sensus AMR meter bids from any other vendor within the area, region, or the country.

5. Refer to Martin County's response to Staff's Initial Request, Item 10. State whether other vendors offer lower-priced meter-setting materials. If so, explain why Martin County does not procure meter-setting materials from the alternative vendor.

6. Refer to Martin County's response to Staff's Initial Request, Items 12, 16, and 17, which are supported by Exhibit B of the filing. The response appears to support a \$23.44 hourly rate with insurance, and a lower hourly rate when insurance expense is not included. Explain how the \$17.54 hourly rate was determined.

7. Refer to Martin County's response to Staff's Initial Request, Item 18. State the basis to assess a fee to "discourage fraud."

8. Provide a revised nonrecurring charge cost justification for the returned check charge to reflect Martin County's response to Staff's Initial Request, Item 18.

9. Refer to Martin County's response to Staff's Initial Request, Item 13, Section D, Installation Labor Expense of the Average Meter Connection Expense Cost Justification form, is for the labor involved in providing the service, and Section E, Installation Equipment Expense, is for the cost of the equipment. Explain why an hourly rate for the cost of hiring someone was used, instead of an estimated cost to rent the equipment, or hourly cost of the equipment.

10. Refer to the application. Please clarify the conflicting information between the tariff sheet and the public notice.

a. The tariff sheet lists the proposed amount for Meter test charge as \$60.00, while the public notice states \$75.00.

b. The tariff sheet lists the proposed amount for Returned Check charge as \$25.00, while the public notice states \$30.00.

c. If the lesser amount in each of the charges above is what the utility intended, provide a detailed explanation and all supporting documentation as to the reasonableness of the lesser amounts while the cost justification provided supports the higher amounts.

11. State whether a deposit fee will be charged if a customer requests a 6-inch or 8-inch meter.



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Public Service Commission
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DATED JUN 30 2015

cc: Parties of Record

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