

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PROPOSED ADJUSTMENT OF)
THE WHOLESALE WATER SERVICE RATES OF) CASE NO.
CENTRAL CITY MUNICIPAL WATER & SEWER) 2017-00199

COMMISSION STAFF'S SECOND REQUEST FOR
INFORMATION TO CITY OF CENTRAL CITY

Central City Municipal Water & Sewer ("Central City W&S"), pursuant to 807 KAR 5:001, is to file with the Commission the original with six copies in paper medium and an electronic version of the following information. The information requested herein is due on or before August 23, 2017. Responses to requests for information in paper medium 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 the 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.

Central City W&S 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 Central

City W&S fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied 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, Central City W&S 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 Testimony of David Rhoades (“Rhoades Testimony”), Table B, and to Central City W&S’s July 31, 2017 Response to Commission Staff’s First Request for Information, (“Central City W&S’s Response to Staff’s Request”), Item 11.a. Table B includes nine water assets upon which Mr. Rhoades calculates annual depreciation expense in the total amount of \$805,502. The Tax Asset Detail provided in Item 11.a. includes the calculation of annual depreciation expense in the total amount of \$1,130,488 accrued on numerous water assets, sewer assets, and assets shared by the water and sewer divisions during the fiscal year ended June 30, 2016. Each asset shown in the Tax Asset Detail is assigned an identification number. On the Tax Asset Detail, there are 55 assets highlighted in blue color that appear to be dedicated to water operations. Depreciation on these assets totals \$744,293, not the \$805,502 shown for water assets on Table B.

a. Table B includes an entry labeled "Water Treatment Plant Renovations – Electronics and Short-Lived Assets" with a cost of \$918,271 and a placed-into-service date of 2013. This entry is depreciated using a ten-year life.

1) List each electronic component and short-lived asset included in the cost of \$918,271 and provide a detailed description of each electronic component and short-lived asset, including its cost.

2) For each electronic component and short-lived asset listed as part of the total cost in the amount of \$918,271, provide its identification number shown on the Tax Asset Detail.

3) On Table B, these assets are depreciated using a ten-year life. If the life used to depreciate each electronic component and short-lived asset on the Tax Asset Detail is not ten years, state the life used on the Tax Asset Detail and the life that Central City W&S believes is appropriate for each electronic component and short-lived asset. Provide the basis for Central City W&S's position.

b. Table B includes an entry labeled "Water Treatment Plant – Equipment" with a cost of \$4,958,633 and a placed-into-service date of 2013. This entry is depreciated over 20 years.

1) Provide a detailed description of each piece of equipment included in this entry and its cost.

2) For each piece of equipment listed as part of the total cost in the amount of \$4,958,633, provide its identification number shown on the Tax Asset Detail.

3) On Table B, the equipment entry is depreciated using a 20-year life. If the life used to depreciate each piece of equipment on the Tax Asset Detail is not 20 years, state the life used on the Tax Asset Detail and the life that Central City W&S believes is appropriate for each piece of equipment. Provide the basis for Central City W&S's position.

c. Table B includes an entry labeled "Water Treatment Plant – Basin and Structures" with a cost of \$12,488,425 and a placed-into-service date of 2013. This entry is depreciated using a 40-year life.

1) Provide a detailed description of the components of plant included in this entry.

2) For each component of plant listed as part of the total cost in the amount of \$12,488,425, provide its identification number shown on the Tax Asset Detail.

3) On Table B, this entry is depreciated over 40 years. If the life used to depreciate each component of plant included in this entry on the Tax Asset Detail is not 40 years, state the life used on the Tax Asset Detail and the life that Central City W&S believes is appropriate for each component of plant. Provide the basis for Central City W&S's position.

d. Table B includes an entry labeled "Reservoir Hill Tank No. 2" with a cost of \$400,000 and a placed-into-service date of 1982. This entry is depreciated over 40 years.

1) Provide this entry's identification number shown on the Tax Asset Detail.

2) On Table B, this asset is depreciated using a 40-year life. If the life used to depreciate this asset on the Tax Asset Detail is not 40 years, state the life used on the Tax Asset Detail and the life that Central City W&S believes is appropriate. Provide the basis for Central City W&S's position.

e. Table B includes an entry labeled "Rose Hill Tank" with a cost of \$759,000 and a placed-into-service date of 2001. This entry is depreciated over 40 years.

1) Provide this entry's identification number shown on the Tax Asset Detail.

2) On Table B, this asset is depreciated using a 40-year life. If the life used to depreciate this asset on the Tax Asset Detail is not 40 years, state the life used on the Tax Asset Detail and the life that Central City W&S believes is appropriate. Provide the basis for Central City W&S's position.

f. Table B includes an entry for "Community College Tank" with a cost of \$1,912,473 and a placed-into-service date of 2013. This entry is depreciated over 40 years.

1) Provide this entry's identification number shown on the Tax Asset Detail.

2) On Table B, this asset is depreciated using a 40-year life. If the life used to depreciate this asset on the Tax Asset Detail is not 40 years, state the life used on the Tax Asset Detail and the life that Central City W&S believes is appropriate. Provide the basis for Central City W&S's position.

g. Table B includes an entry labeled “Reservoir Hill Tank No. 1 – Renovation” with a cost of \$156,190 and a placed-into-service date of 2014. This entry is depreciated over 15 years.

- 1) Provide a detailed description of this entry.
- 2) Provide the identification number for this entry shown on the Tax Asset Detail.
- 3) On Table B, this asset is depreciated using a 15-year life. If the life used to depreciate this asset on the Tax Asset Detail is not 15 years, state the life used on the Tax Asset Detail and the life that Central City W&S believes is appropriate. Provide the basis for Central City W&S’s position.

h. Table B includes an asset labeled “New Transmission Lines” with a 2014 “In-Service Date.” This asset is assigned a 50-year depreciable life. On the Tax Asset Detail, Asset numbers 3 and 13 are water lines that have been assigned a 100-year depreciable life.

- 1) Provide detailed descriptions for each of these three water mains.
- 2) Explain why Central City W&S thinks that the life of the main shown on Table B will be one-half of the life of the mains shown on the Tax Asset Detail.
- 3) Provide the identification number shown on the Tax Asset Detail for the asset identified as “New Transmission Lines – 2014” on Table B.
- 4) On Table B, the New Transmission Lines – 2014 are depreciated using a 50-year life. If the life used to depreciate this asset on the Tax Asset

Detail is not 50 years, state the life used on the Tax Asset Detail and the life that Central City W&S believes is appropriate. Provide the basis for Central City W&S's position.

2. Refer to the Rhoades Testimony, Table B. The following assets are listed with their "In-Service Date" and "Useful Life."

	<u>In-Service Date</u>	<u>Estimated Useful Life</u>
Water Treatment Plant (pre-renovation)	1963	40 Years
Reservoir Hill Tank No. 1	1938	40 Years
Stringtown Road Tank	1967	40 Years
Water Distribution System	1938	50 Years

a. State whether each asset listed above is currently in service and is being used to provide water service by Central City W&S.

b. Provide a detailed description of the asset labeled above as "Water Distribution System" that was placed into service in 1938.

3. Refer to Central City W&S's Response to Staff's Request, Items 11.a. and 23. Item 11.a. is the Tax Asset Detail. On this schedule, there is an identification number provided in the first column for each asset shown. Item 23 shows the total miles of main in Central City W&S's water system grouped by the size of the main's diameter, i.e., 2-inch, 4-inch, 6-inch, etc.

a. Separate each diameter size of main shown in Item 23 into sub-groups for each year that the main was placed into service.

b. Provide the total cost of installing each diameter of main placed into service for each year shown in response to Item 3.a. above.

c. State the identification number shown in Item 11.a. for each diameter of main placed into service during each year shown in response to Item 3.a. above.

4. Refer to the testimony of Michael W. McGhee (“McGhee Testimony”), Exhibit 1, pages 16 and 17.

a. Confirm that Central City W&S determines its customers’ billings for sewer service using water meter readings.

b. State the total cost of meter reading incurred by Central City W&S for the fiscal year ended June 30, 2016, separated into the following categories.

Employee Wages
Employee Benefits:
 Health Insurance
 Dental Insurance
Payroll Taxes
Materials and Supplies
Transportation Costs
Other, specify

Total Cost of Meter Reading

c. Confirm that the total cost of meter reading shown above is reported entirely as a “Water” expense on pages 16 and 17 and that none of these meter reading costs have been reported with “Sewer” expenses.

5. Refer to the McGhee Testimony, Exhibit 1, page 17 and to Central City W&S’s Response to Staff’s Request, Item 8.

a. Except for “Legal and accounting,” “Bank Fees,” and “Grinder pump expense,” all other “General & Administrative Expenses” listed on page 17 are allocated 60 percent to water operations and 40 percent to sewer operations, as described in Item 8. The number of customers served by water operations and sewer operations, as stated in Item 8, and the percentage of each operations’ number of customers when compared to the total number of customers are shown below.

	<u>Number of Customers</u>	<u>Percent of Total</u>
Water	2,058	53%
Sewer	<u>1,819</u>	<u>47%</u>
Total	<u><u>3,877</u></u>	<u><u>100%</u></u>

Given that the vast majority of the “General & Administrative Expenses” that have been split between water and sewer operations using a 60/40 allocation factor are presumably related to customer service and customer account functions, state whether Central City W&S agrees that it would be more appropriate to allocate these expenses using a 53/47 allocation factor based on the number of customers served by the water and sewer operations. If Central City W&S does not agree, provide the basis for Central City W&S’s disagreement.

b. On page 17, all “Legal and accounting” expenses were reported by water operations. Explain why no legal or accounting fees were allocated to sewer operations.

c. On page 17, “Bank Fees” were charged 57 percent to water operations and 43 percent to sewer operations. Provide the basis for this allocation.

6. Refer to Central City W&S’s Response to Staff’s Request, Item 14.e. Central City W&S states, “The 2013 bond issuance was used to refinance a prior debt.”

- a. Provide the name of the lender of the “prior debt.”
- b. State how Central City W&S used the proceeds from the issuance of the “prior debt.”
- c. State the date that the “prior debt” originated.

7. Provide the calculation of the three-year average annual payment to be made on all of Central City W&S's long-term debts related to water operations for the years 2018, 2019, and 2020. This calculation should show each principal, interest, and administrative payment separately.

8. Provide the calculation of the five-year average annual payment to be made on all of Central City W&S's long-term debts related to water operations for the years 2018, 2019, 2020, 2021, and 2022. This calculation should show each principal, interest, and administrative payment separately.

9. Refer to the McGhee Testimony, Exhibit 1, page 16. "Miscellaneous-Sewer" revenues are reported in the amount of \$34,016. Describe the services provided by Central City W&S to earn this revenue.

10. Refer to Central City W&S's Response to Staff's Request, Item 6, and to the McGhee Testimony, Exhibit 1, page 17. In Item 6, pages 52 and 53, Central City W&S reports "Admin. – Building" expense in the total amount of \$14,287, which includes: \$2,250 to "AMOS SERVICE & S"; \$2,588 to "Southeast Banki"; and \$9,450 to "Kelly Payne – Ad." On page 17, Central City W&S allocates these expenses 60 percent to water operations and 40 percent to sewer operations.

a. Provide a detailed description of the goods or services provided to Central City W&S by "AMOS SERVICE & S" in return for \$2,250 and state the reasons why the 60/40 allocation between water and sewer operations is appropriate.

b. Provide a detailed description of the goods or services provided to Central City W&S by "Southeast Banki" in return for \$2,588 and state the reasons why the 60/40 allocation between water and sewer operations is appropriate.

c. Provide a detailed description of the goods or services provided to Central City W&S by “Kelly Payne – Ad” in return for \$9,450, and state the reasons why the 60/40 allocation between water and sewer operations is appropriate.

11. Refer to Central City W&S’s Response to Staff’s Request, Item 6, pages 53 and 54. Provide copies of invoices from Lawton Insurance for each entry made to account “5100, Admin. – Municip.”

12. Refer to Central City W&S’s Response to Staff’s Request, Item 6, page 54. Confirm that the workers compensation insurance charges reported to account “5101, Admin. – Workma” represent workers compensation insurance coverage for all Central City W&S water and sewer employees and is not limited to administrative employees.

13. Refer to Central City W&S’s Response to Staff’s Request, Item 6, page 55. Provide a copy of the invoice from “MCGHEE ENGINEE” in the amount of \$1,500.

14. Refer to Central City W&S’s Response to Staff’s Request, Item 6, pages 55 to 58. Confirm that the employee uniform expense reported to account “5111, Admin. – Uniform” represents uniform expenses for all Central City W&S water and sewer employees and not just administrative employees.

15. Refer to Central City W&S’s Response to Staff’s Request, Item 6, pages 58 and 59. The balance for account “5130, Admin. – CERS,” excluding the last three entries to the account, is \$142,601. Confirm that \$142,601 is the amount of Central City W&S’s contribution to CERS during the year and that this amount does not include any contributions made by Central City W&S’s employees. If this cannot be confirmed, state the amount of CERS contributions made by Central City W&S that does not include the employee’s share of CERS contributions.

16. Refer to Central City W&S's Response to Staff's Request, Item 6, pages 60 and 61. Rent to "City of Central" is stated at \$6,000 per month, or \$72,000 per year.

a. Provide a detailed description of the facilities provided to Central City W&S "City of Central" in return for these rental fees.

b. Provide documentation and evidence that the amount of the rental fees are at fair market value.

17. Refer to Central City W&S's Response to Staff's Request, Item 6, pages 61 to 67. The cost of electricity provided to Central City W&S by "Kentucky Utiliti" totals \$312,136. Provide a schedule that lists the service addresses for all "Kentucky Utiliti" meters at which Central City W&S receives electrical service and provide the following for each service address:

a. A description of the facilities that require electrical power. (This description shall include a statement that the facilities are used by the water division, the sewer division, or both divisions.)

b. The cost of electricity used during each month of the fiscal year ended June 30, 2016. The total cost for all service addresses and all months should equal \$312,136.

18. Refer to Central City W&S's Response to Staff's Request, Item 6, pages 67 and 68. Charges from AT&T total \$22,210. Provide a detailed description of the services provided by AT&T in return for these charges.

19. Refer to Central City W&S's Response to Staff's Request, Item 6, page 70. There appear to be as many as five locations at which Central City W&S receives natural gas service from Atmos Energy. Provide the service address at each location at which

Central City W&S receives natural gas service from Atmos Energy. For each service address provide the following:

a. A description of the facility that requires natural gas. (This description shall include a statement that the facilities are used by the water division, the sewer division, or both divisions.)

b. The cost of gas for each month of the fiscal year ended June 30, 2016.

20. Refer to Central City W&S's Response to Staff's Request, Item 6, pages 71 and 72. Provide a copy of the vendor invoice for each of the following entries to account "5290, Admin. – Misc" and provide a detailed description of how each invoiced item was used in the operation of Central City W&S's water system. This description shall include a discussion of the consideration given to capitalizing the invoiced item instead of recording the item as an expense.

<u>"Reference"</u>	<u>"Trans Description"</u>	<u>"Debit Amt"</u>
4739	Cornerstone CA	\$ 568.86
5130	Cornerstone CA	219.56
5195	U of K Transpor	2,133.34
5209	First National B	4,200.00
5210	Cornerstone CA	209.58
5408	City of Central	520.00
5408	City of Central	800.00
5421	Omega Rail Mana	900.00
5572	U of K Transpor	400.00

21. Refer to Central City W&S's Response to Staff's Request, Item 6, page 72. With "Adj. 20," Central City W&S capitalized \$12,182 of costs that were reported as an expense when originally entered into the general ledger.

a. Provide a list of the items capitalized and their cost. (The total cost of all items listed should equal \$12,182.)

b. For each item listed, state the methods used by Central City W&S to determine that the item should be capitalized instead of expensed.

22. Provide a schedule showing the quantity and cost of each type of chemical used to operate Central City W&S's water treatment plant during each month of the previous five years.

23. Refer to Central City W&S's Response to Staff's Request, Item 6, pages 80 and 81.

a. Confirm that the total amount of \$77,764.51 reported to account "6200, Admin. – Health I" represents the total amount of health insurance premiums paid by Central City W&S on behalf of all of its employees and not on behalf of administrative employees only.

b. Confirm that the total amount of \$77,765 includes only the portion of health insurance premiums paid by Central City W&S and that this amount excludes the portion paid by Central City W&S employees.

24. Refer to Central City W&S's Response to Staff's Request, Item 6, page 83.

a. Confirm that the total amount of \$2,443 reported to account "6202, Admin. – Dental" represents the total amount of dental insurance premiums paid by Central City W&S on behalf of all of its employees and not on behalf of administrative employees only.

b. Confirm that the total amount of \$2,443 includes only the portion of dental insurance premiums paid by Central City W&S and that this amount does not include the portion paid by Central City W&S's employees.

25. Refer to the McGhee Testimony, Exhibit 1, page 16 and to Central City W&S's Response to Staff's Request, Item 6, pages 95 and 96. On pages 95 and 96 of account "8010, Water Dist. – Gas" is reported in the amount of \$17,696. On page 16, the entire amount is reported as "Water Distribution, Gas and Oil." No portion of this amount is reported as a "Sewer Collection" expense. Explain why there are no transportation costs reported with "Sewer Collection" expenses to account for the transportation costs incurred to maintain the sewer collection system.

26. Refer to Central City W&S's Response to Staff's Request, Item 6, pages 96 and 97. Provide a copy of the vendor invoices for each of the following entries to account "8030, Water Distr. – Re" and provide a detailed description of how each invoiced item was used in the operation of Central City W&S's water system. This description shall include a discussion of the consideration given to capitalizing the invoiced item instead of recording the item as an expense.

<u>"Reference"</u>	<u>"Trans Description"</u>	<u>"Debit Amt"</u>
5040	Bastin Enterpri	\$3,565.00
5257	Bucks Asphalt P	1,500.00
5382	IMPCO	7,385.65
5528	I.T.M. INC	750.00
5664	C&S Quality SVC	1,500.00

27. Refer to Central City W&S's Response to Staff's Request, Item 6, pages 97 through 100. Provide a copy of the vendor invoices for each of the following entries to account "8050, Water Dist. - Part" and provide a detailed description of how each invoiced

item was used in the operation of Central City W&S's water system. This description shall include a discussion of the consideration given to capitalizing the invoiced item instead of recording the item as an expense.

<u>"Reference"</u>	<u>"Trans Description"</u>	<u>"Debit Amt"</u>
4700	Conery MFG Inc.	\$ 436.92
4702	Fortiline Inc	1,338.35
4703	G&C Supply Co.	2,370.49
4724	Bobby Vincent	1,300.00
4764	Smith Brothers	689.21
4775	G&C Supply Co.	655.60
4789	Road Builders	1,980.12
4814	G&C Supply Co.	477.90
4821	G&C Supply Co.	739.77
4835	The Dodge Comp	546.48
4863	Smith Brothers	622.99
4880	G&C Supply Co.	511.06
4896	Road Builders	1,454.71
4928	J.H. Rudolph & Co.	2,475.75
4938	G&C Supply Co.	2,809.22
4962	G&C Supply Co.	970.62
4974	Finley Fire Equip	550.00
4978	Road Builders	2,278.47
4983	G&C Supply Co.	505.24
4994	Arrow Head Fixi	2,250.00
5006	Finley Fire Equip	1,146.16
5021	H&R Agri-Powe	1,995.00
5033	Rycom Instrume	521.93
5045	Road Builders	1,553.29
5053	Smith Brothers	488.19
5107	Fortiline Inc	1,240.54
5136	Conery MFG Inc.	1,229.95
5139	J.H. Rudolph & Co.	2,415.90
5143	Ohio Valley 2-WA	967.07
5160	Road Builders	1,774.58
5189	The Dodge Comp	547.83
5218	Fortiline Inc	2,187.39
5219	G&C Supply Co.	2,232.30
5227	Mike Jones Exca	498.36
5239	Rural King Distr	698.48
5283	Fortiline Inc	1,053.39
5309	Tri-City Auto	552.71
5342	Pace Tire Cente	701.19
5342	Johnny Dukes	3,500.00
5393	Fortiline Inc	1,474.85

<u>"Reference"</u>	<u>"Trans Description"</u>	<u>"Debit Amt"</u>
5412	Conery MFG Inc.	965.54
5425	Road Builders	1,607.00
5438	Fortiline Inc	577.12
5454	Road Builders	1,532.80
5524	Big River Rubber	522.62
5527	Fortiline Inc	1,456.92
5541	Ace Supply Com	735.00
5585	Road Builders	1,522.34
5596	G&C Supply Co.	10,558.00
5602	USA Bluebook	1,005.22
5676	Road Builders	3,465.76
5699	Fortiline Inc	1,468.54
5701	J.H. Rudolph & Co.	2,348.85
5749	Fortiline Inc	2,685.80
5751	Irvine Materials	1,912.00
5781	Pace Tire Cente	1,103.92
5782	Road Builders	875.99
Adj. - Water	-	5,000.00

28. Refer to Central City W&S's Response to Staff's Request, Item 6, page 101. Provide a copy of the vendor invoices for each of the following entries to account "8060, Water Dist. - Mai" and provide a detailed description of how each invoiced item was used in the operation of Central City W&S's water system. Include in this description a discussion of the consideration given to capitalizing the invoiced item instead of recording the item as an expense.

<u>"Reference"</u>	<u>"Trans Description"</u>	<u>"Debit Amt"</u>
4868	Countryside Tra	\$1,701.65
4946	Master Meter Sy	1,500.00
5083	Shemwell's Exte	1,315.00
5413	ERB Equipment C	828.36
5439	Danco Trim Inc	1,750.00

29. Refer to the McGhee Testimony, Exhibit 1, pages 16 and 17, and Central City W&S's Response to Staff's Request, Item 9. On pages 16 and 17, Employee wages total \$851,271, as detailed below.

Water	
Page 16	
Plant Operation	\$379,679
Distribution	237,090
Page 17	
Office Salaries	59,600
Total Water	<u>676,369</u>
Sewer	
Page 16	
Plant Operation	135,169
Page 17	
Office Salaries	39,733
Total Sewer	<u>174,902</u>
Grand Total	<u>\$851,271</u>

Item 9 required Central City W&S to provide information concerning wages for all employees of Central City W&S, but the response includes "water payroll" totaling \$704,415. This amount does include sewer wages and does not match water wages shown in Exhibit 1. Accurately provide all information that was originally requested in Item 9.

30. Refer to the McGhee Testimony, page 3, Line 16. Central City W&S proposes a 21.2 percentage increase to the volumetric rates to produce the necessary revenues. State the percentage increase that would be required to all monthly water rates if, in addition to an increase in the volumetric rates, the retail minimum bills were also increased.

31. Refer to the McGhee Testimony, page 3, line 20. Mr. McGhee states, in pertinent part, that “a flat, across-the-board increase is reasonable.” Confirm that Central City W&S is not increasing the monthly minimum bill to retail city customers and confirm that the minimum bill contains an amount of volumetric usage. Provide a detailed explanation as to why maintaining the current minimum bill amount is appropriate and how that is consistent with the approach of a flat, across-the-board increase.

32. Refer to Central City W&S response to Water Districts First Request for Information, Item 19.

a. Explain the title headings on the spreadsheets.

b. Reconcile the water treated to the production gallons, which are included in the response to WD 20.

33. Refer to Central City’s responses to Commission Staff’s First Request for information, Item 27.

a. State whether the water sales to the Central City W&S’s “Outside the city limits” retail customers are included in the response.

b. State the number of retail customers that are outside the city limits and receive a monthly minimum bill with a 2,000-gallon usage allowance.

34. Refer to Central City W&S’s Response to the Water Districts’ First Request for Information, Item 15.

a. Using Central City W&S’s current water service rates, quantify the amount of the revenue lost by Central City W&S during the fiscal year ended June 30, 2016, as a result of providing free water service to the entities listed. Provide all work papers showing all calculations

b. Using Central City W&S's proposed water service rates, quantify the amount of the average annual revenue that will be lost from providing free water service to the entities listed. Provide all work papers showing all calculations.



John S. Lyons
Acting Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED AUG 11 2017

cc: Parties of Record

Case No. 2017-00199

*Honorable Damon R Talley
Attorney at Law
Stoll Keenon Ogden PLLC
P.O. Box 150
Hodgenville, KENTUCKY 42748

*Central City Municipal Water & Sewer
208 N. First Street
Central City, KY 42330

*Muhlenberg County Water District
Muhlenberg County Water District
301 Dean Road
P. O. Box 348
Greenville, KY 42345

*David Rhoades
City Administrator
City of Central City
214 North First Street
Central City, KENTUCKY 42330

*Gerald E Wuetcher
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*James W Gardner
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Mary Ellen Wimberly
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Muhlenberg County Water District #3
Muhlenberg County Water District #3
4789 Main Street
P. O. Box 67
Bremen, KY 42325

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507