

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF WATER	)	CASE NO.
SERVICE CORPORATION OF KENTUCKY FOR A	)	2020-00160
GENERAL ADJUSTMENT IN EXISTING RATES	)	

ORDER

On June 1, 2020, Water Service Corporation of Kentucky Water District (Water Service Kentucky) submitted an application (Application) requesting to adjust its monthly water service rates pursuant to KRS 278.190 to be effective July 1, 2020,<sup>1</sup> or sooner if allowed by the Commission. The Commission finds that a procedural schedule should be established to ensure the orderly review of Water Service Kentucky's Application.

Based on a review of the application, the Commission further finds that an investigation will be necessary to determine the reasonableness of the proposed rates and the investigation cannot be completed by July 1, 2020. Therefore, pursuant to KRS 278.190(2), the Commission will suspend the effective date of the proposed rates for five months and establish a schedule for review of the proposed rates.

IT IS THEREFORE ORDERED that:

1. The proposed rates set forth in Water Service Kentucky's application are suspended for five months from July 1, 2020, up to and including December 1, 2020.

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<sup>1</sup> Although the first paragraph of Application refers to a proposed effective date of August 1, 2020, it appears to be a typographical error given the July 1, 2020 references in Exhibits 2 and 3 of the Application and that July 1, 2020 is the earliest date in which the proposed rates can become effective.

2. The procedural schedule set forth in Appendix A to this Order shall be followed.

3. The information requested herein is due on or before July 14, 2020.

a. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed and shall include the name of the witness responsible for responding to the questions related to the information provided, with an original in paper medium and an electronic version to the Commission.

b. 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.

c. Any party 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.

d. For any request to which a party fails to furnish all or part of the requested information that party shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

e. When filing a paper containing personal information, Water Service Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

4. Any party filing testimony shall file in accordance with the electronic filing procedures set forth in 807 KAR 5:001, Section 8, with one copy in paper medium to the Commission.

5. Any person who submits a motion to intervene after July 10, 2020, and upon a showing of good cause is granted full intervention, shall accept and abide by the existing procedural schedule.

6. Water Service Kentucky shall give notice of the hearing in accordance with the provisions set out in 807 KAR 5:001, Section 9(2)(b). At the time publication is requested, Water Service Kentucky shall forward a duplicate of the notice and request to the Commission.

7. At any hearing in this matter, neither opening statements nor summarization of written testimony shall be permitted.

8. Any objections or motions relating to discovery or procedural dates shall be filed upon four business days' notice or the filing party shall explain, in writing, why such notice was not possible.

9. Motions for extensions of time with respect to the schedule herein shall be made in writing and will be granted only upon a showing of good cause.

10. Nothing contained herein shall prevent the Commission from entering further Orders in this matter.

By the Commission



ATTEST:



Executive Director

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE  
COMMISSION IN CASE NO. 2020-00160 DATED JUN 26 2020

Water Service Kentucky shall file with the Commission its responses to the Commission's first request for the information shown in Appendix B no later than ..... 07/14/2020

Requests for intervention shall be filed no later than .....07/10/2020

All requests for information to Water Service Kentucky and the Commission's second request for information shall be filed no later than ..... 08/05/2020

Water Service Kentucky shall file responses to the requests for information no later than ..... 08/19/2020

Supplemental requests for information to Water Service Kentucky and the Commission's third request for information shall be filed no later than ..... 09/09/2020

Water Service Kentucky shall file responses to supplemental requests for information no later than ..... 09/21/2020

Intervenor testimony, if any, in verified prepared forms shall be filed no later than ..... 09/28/2020

Requests for information to Intervenors shall be filed no later than ..... 10/10/2020

Intervenors shall file responses to requests for information no later than ..... 10/21/2020

Water Service Kentucky shall file its rebuttal testimony, if any, of its rebuttal witnesses no later than ..... 10/27/2020

Public Hearing to be held at the Commission's offices at 211 Sower Boulevard, Frankfort, Kentucky, for the purpose of cross-examination of the witnesses of Water Service Kentucky and Intervenors ..... To Be Announced

Briefs, if any, shall be filed ..... To Be Announced

## APPENDIX B

### APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2020-00160 DATED JUN 26 2020

1. Provide the monthly usage data for each Water Service Kentucky customer in gallons of water for the test period in Excel format with all columns and rows accessible and all formulas unprotected.

2. a. Provide a current organization chart that shows the corporate structure of Water Service Kentucky and all of its affiliated companies.

b. Provide a description of all regulated and nonregulated business activities of each company listed in the organization chart provided in response to item 2.a. This description should include, but not be limited to, the amount of revenues and expenses reported from each regulated and nonregulated activity for the year ended December 31, 2019, and the number of customers served by each regulated operation.

c. Describe the accounting and internal control policies and procedures that are in place to ensure that all financial transactions are charged to the proper company and that nonregulated operations are properly separated and reported from regulated operations.

3. Provide all workpapers, show all calculations, and state all assumptions that Water Service Kentucky used to develop its pro forma test-period financial information. For all workpapers and calculations that exist in an electronic spreadsheet format, provide on an electronic storage medium an electronic copy that is capable of being read and manipulated using Excel.

4. a. State whether any of the internal accounting manuals, directives, policies, and procedures that Water Service Kentucky submitted in Case No. 2018-00208<sup>1</sup> have been modified, amended or replaced.

b. For each manual, directive, policy or procedure that has been modified, amended, or replaced, provide the current version of the document and identify the portions of the current version that differ from the document that Water Service Kentucky previously provided.

5. Provide a schedule listing and describing each project included in the test-year Construction Work in Progress (CWIP).

6. a. Provide a test-period general ledger for Water Service Kentucky that includes all asset, liability, capital, income, and expense accounts that clearly shows all account numbers, subaccount numbers, account titles, subaccount titles, and all entries to each account for the 12 months of the test year. For each entry, indicate the date paid, vendor name, check number used to make payment, and the amount. Also, distinguish all entries made to record costs directly assigned to Water Service Kentucky from those made to record an allocation of common costs to Water Service Kentucky.

b. Provide the test-period general ledger in Excel format with all columns and rows accessible and all formulas unprotected.

7. a. For each cash account used by Water Service Kentucky during the test-period, provide a cash disbursements ledger that lists all checks in chronological order and details the date paid, check number, vendor, and amount.

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<sup>1</sup> Water Service Corporation of Kentucky's Response to Initial Data Request, (filed July 27, 2018) (filed in Case No. 2018-00208), *Application of Water Service Corporation of Kentucky for an Adjustment of Rates* (Ky. PSC filed June 18, 2019).

b. Provide on an electronic storage medium in Excel format the test-period cash disbursements ledger.

8. Provide all audit adjustments made for the test-period financial statements.

9. a. For each employee of Water Service Kentucky, Water Service Corporation, or an affiliate who had wages charged to Water Service Kentucky during the test year, provide:

(1) Name of the company that is responsible for payroll tax withholdings and payments.

(2) Employee Identification Number.

(3) Title.

(4) Length of employment.

(5) Job duties.

(6) Test-period pay rate and current pay rate.

(7) Test-period regular time worked and overtime worked.

(8) Total test-period wages allocated to Water Service Kentucky, Water Service Corporation, and any other affiliate.

(9) Total test-period payroll expensed and capitalized by Water Service Kentucky.

(10) Percentage of test-period payroll capitalized by Water Service Kentucky.

(11) Type of employee benefits (e.g., health insurance, dental insurance, vision insurance, pension) and the amount reported by Water Service Kentucky.



b. Provide the information requested in Item 9.a. in Excel spreadsheet format with all formulas unprotected and all rows and columns fully accessible.

c. Provide the employer retirement contribution rate(s) that were in effect during calendar years 2016, 2017, 2018, and 2019 and the date the rate(s) became effective.

d. If the employer retirement contribution rate changed or will change in the 2019 calendar year, provide the initial rate, the reason for the change, the new rate, and the effective date of the change or proposed change.

10. a. Identify all employees listed in the response to Item 9.a. who are no longer employed by Water Service Kentucky, Water Service Corporation, or an affiliate.

b. For each employee identified in the response to Item 10.a.:

(1) If the employee's position has been filled, identify the employee currently in the position and state the date on which the replacement employee(s) was hired, his or her actual annualized salary and actual benefit information, and the salary and employee benefit costs that are included in Water Service Kentucky's pro forma operating expenses.

(2) If the position is currently vacant, state:

(a) The reason(s) why the position is vacant.

(b) The current status of Water Service Kentucky's efforts to fill the position and the anticipated hire date.

(c) Whether the cost of the position is included in the pro forma salaries and wage expense.

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

11. a. Provide a schedule detailing each test-period expenditure related to the application filed in this proceeding. Provide in the schedule the nature and amounts of each charge.

b. Provide the vendor invoice for each expenditure listed in response to Item 11.a. 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.

c. Provide a monthly update of the schedule requested in Item 11.a. that shows total costs incurred as of that date and that includes the supporting detailed vendor invoices as requested in Item 11.b.

12. a. Describe Water Service Kentucky's long-term construction planning program and provide all memoranda and internal documents in which the program is discussed and approved.

b. Describe the process used by Water Service Kentucky's parent companies to determine the system-wide level of annual capital investment budgets.

c. Describe the process used by Water Service Kentucky's parent companies to determine how the annual capital budgets are divided among its subsidiaries.

13. Provide a complete copy of all wage, compensation, and employee benefits studies, analyses, or surveys conducted for or used by Water Service Kentucky, Water Service Corporation, or an affiliate.

14. For each water operation employee group, state the amount, percentage increases, and effective dates for:

a. General wage increases granted for the years 2017, 2018, 2019, and 2020.

b. Merit wage increases granted for the years 2017, 2018, 2019, and 2020.

15. Describe each early retirement plan or other staff reduction programs Water Service Kentucky, Water Service Corporation, or an affiliate offered its employees during 2019 or intends to offer during 2020, and provide all cost-benefit analyses performed for each program.

16. Provide a detailed list of all fringe benefits available to employees of Water Service Corporation and its affiliates, and the cost of each benefit in 2016, 2017, 2018, and 2019 and the expected cost of each benefit to be provided in 2020 and 2021. Indicate which fringe benefits, if any, are limited to management employees.

17. List separately the budgeted and actual numbers of full- and part-time employees by employee group, by month and by year, for 2016 through 2020.

18. Provide complete details of Other Post-retirement Employee Benefits package(s) offered by Water Service Corporation and its affiliates.

19. Provide all current labor contracts and the most recent contracts previously in effect.

20. Provide a copy of each group medical insurance policy that Water Service Corporation, and its affiliates, currently maintains.

21. List each property leased to Water Service Kentucky and state the amount of the annual lease payment.

22. Provide a calculation of federal and state income tax expense, including a reconciliation of book to taxable income for 2019 and 2020 in the format provided in Schedule 22, as shown at the end of this Appendix.

23. a. Provide each service agreement or contract that Water Service Kentucky has with an affiliate company.

b. Describe the pricing policies of Water Service Kentucky and its affiliates regarding affiliate company transactions.

24. a. List and describe each good or service that is provided to Water Service Kentucky by any affiliated company.

b. Describe the benefits that Water Service Kentucky derives from an affiliate providing the goods or services identified in Item 24.a.

c. List and describe each good or service that Water Service Kentucky provides to an affiliated company.

25. a. Provide a schedule<sup>1</sup> that lists the allocated expenses from Water Service Corporation, or another affiliate, to Water Service Kentucky by month for the test period.

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<sup>1</sup> The schedule should present the requested information in the same format that WSKY used in its Response to Commission Staff's First Information Request, Item 27(a), in Case No. 2013-00237.

b. Provide a schedule<sup>1</sup> that lists the direct charges from Water Service Corporation, or another affiliate, to Water Service Kentucky's direct expenses by month for the test period. Provide the information requested in 25(a) and 27(b) in Excel spreadsheet format with all formulas unprotected and all rows and columns fully accessible.

26. Provide each monthly invoice that Water Service Corporation, or another affiliate, issued to Water Service Kentucky for the test period.

27. a. Identify the electric utility that serves Water Service Kentucky's facilities in Middlesboro.

b. Provide the monthly bills that were rendered to Water Service Kentucky during the test period for electric service to its facilities in Middlesboro.

c. State the rate schedule(s) under which the electric utility provides electric service to Water Service Kentucky facilities in Middlesboro. If service is provided under more than one rate schedule, list for each rate schedule the facilities that are served under that rate schedule.

28. a. Identify the electric utility that serves Water Service Kentucky's facilities in Clinton.

b. Provide the monthly bills that were rendered to Water Service Kentucky during the test period for electric service to its facilities in Clinton.

c. State the rate schedule(s) under which the electric utility provides electric service to Water Service Kentucky facilities in Clinton. If service is provided under

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<sup>1</sup> The schedule should present the requested information in the same format that WSKY used in its Response to Commission Staff's First Information Request, Item 27(b), in Case No. 2013-00237.

more than one rate schedule, list for each rate schedule the facilities that are served under that rate schedule.

29. Provide an electronic version of the cost-of-service study filed with Water Service Kentucky's application in Excel format with all formulas unprotected and all rows and columns fully accessible. All formulas contained in the electronic version should be self-contained and without any linked references to or macro commands involving external files.

30. Provide a list, with descriptions, of all activities, initiatives, or programs undertaken or continued by Water Service Kentucky since its last general rate case for the purpose of minimizing costs or improving the efficiency of its operations or maintenance activities.

31. Refer to the Application, Exhibit 5, the Direct Testimony of Robert Guttormsen (Guttormsen Testimony), page 31. Water Service is requesting the Commission authorize a Qualified Infrastructure Project (QIP) Tariff Rider. Provide the proposed language Water Service of Kentucky proposes to use for its QIP Tariff Rider.

32. Provide a detailed list of the projects that would be recovered through the first five years of Water Service of Kentucky's proposed QIP Tariff Rider. The list should include the projected cost of each project and estimates of the QIP that would be required for each project.

33. Explain in detail how Water Service of Kentucky's proposed QIP will function and provide Water Service of Kentucky's proposed QIP formula.

34. Provide a sample calculation of the proposed QIP charge for year one.

35. a. Provide all written procedures, policies, and guidelines that Water Service of Kentucky currently uses to rank and prioritize the replacement of its aging water mains.

b. If no written procedures, policies or guidelines exist, describe how Water Service of Kentucky currently prioritizes or ranks the replacement of its aging water mains.

36. Provide a schedule for the ten-year period ending calendar year 2019 listing the annual rate of water main replacement (in miles) in Water Service of Kentucky's Middlesboro service territory. Include the annual cost of the mains that were replaced and provide a detailed reason for the main replacement.

37. Provide a schedule for the ten-year period ending calendar year 2019 listing the annual rate of water main replacement (in miles) in Water Service of Kentucky's Clinton service territory. Include the annual cost of the mains that were replaced and provide a detailed reason for the main replacement.

38. List each Water Service of Kentucky affiliate that currently uses a tariff rider similar to Water Service of Kentucky's proposed QIP Rider and state the frequency of its general rate adjustment proceedings for the ten years prior to implementing the tariff rider and the frequency of general rate adjustment proceedings since adopting the tariff rider.

39. Refer to the Application, Exhibit 5, Guttormsen Testimony, page 27. Mr. Guttormsen testifies that over 80 percent of Water Service of Kentucky's investment in its computers is depreciated on its financial books over eight years and another 10 percent of the computers are depreciated over three years.

- a. Identify the depreciation lives used by Water Service of Kentucky for the remaining 10 percent of its computer plant.
- b. Provide Water Service of Kentucky's rationale for depreciating its computer plant over different depreciation lives for its financial books.
- c. Provide any analysis or study prepared by Water Service of Kentucky or its auditors showing that the book depreciation lives used by Water Service of Kentucky's to depreciate its computer plant are reasonable.
- d. Provide any other form of documentation that supports Water Service of Kentucky's proposed depreciation lives for its computer plant.

[THREE PAGES TO FOLLOW]



Water Service Kentucky  
Case No. 2020-00160  
Adjusted Jurisdictional Federal and \_\_\_\_\_ State Income Taxes\*  
For the 12 Months Ended \_\_\_\_\_

Schedule 22  
Page 1 of 3  
Witness Responsible: \_\_\_\_\_

Line No.	Description	At Current Rates			At Proposed Rates	
		Unadjusted (1)	Schedule 49 Adjustments (2)	Adjusted (3)	Adjustments (4)	Adjusted (5)
1	Operating Income Before Income Taxes	\$	\$	\$	\$	\$
2	Reconciling Items:					
3	Interest Charges					
4	Tax Accelerated Depreciation					
5	Book Depreciation	_____	_____	_____	_____	_____
6	Excess of Tax Over Book Depreciation					
7	Other Reconciling Items (Specify and List)	_____	_____	_____	_____	_____
8	Total Reconciling Items					
9	Taxable Income	_____	_____	_____	_____	_____
10	Income Tax Rates:					
11	\$ _____ @ _____ %					
12	\$ _____ @ _____ %					
13	\$ _____ @ _____ %					
14	\$ _____ @ _____ %					
15	Over \$ _____ @ _____ %	_____	_____	_____	_____	_____
16	Federal (State) Income Tax Liability	_____	_____	_____	_____	_____

\*Separate Schedules should be completed for the Federal and State calculations.

Water Service Kentucky  
Case No. 2020-00160  
Adjusted Jurisdictional Federal and \_\_\_\_\_ State Income Taxes\*  
For the 12 Months Ended \_\_\_\_\_

Schedule 22  
Page 2 of 3  
Witness Responsible:  
\_\_\_\_\_

Line No.	Description	At Current Rates			At Proposed Rates	
		Unadjusted (1)	Schedule 49 Adjustments (2)	Adjusted (3)	Adjustments (4)	Adjusted (5)
17	Investment Tax Credits	\$ _____	\$ _____	\$ _____	\$ _____	\$ _____
18	Federal (State) Income Taxes – Current	_____	_____	_____	_____	_____
19	Deferred Income Taxes:					
20	Tax Accelerated Depreciation					
21	Tax Straight-Line Depreciation	_____	_____	_____	_____	_____
22	Excess of Accelerated Over Straight-Line Depreciation					
23	Deferred Income Tax @ _____ %					
24	Amortization of Prior Years Deferred Income Taxes	_____	_____	_____	_____	_____
25	Net Deferred Income Taxes Resulting from Depreciation					
26	Investment Tax Credit Deferred					
27	Amortization of Prior Year ITC	_____	_____	_____	_____	_____

\*Separate Schedules should be completed for the Federal and State calculations.

Water Service Kentucky  
Case No. 2020-00160  
Adjusted Jurisdictional Federal and \_\_\_\_\_ State Income Taxes\*  
For the 12 Months Ended \_\_\_\_\_

Schedule 22  
Page 3 of 3  
Witness Responsible:  
\_\_\_\_\_

Line No.	Description	At Current Rates			At Proposed Rates	
		Unadjusted (1)	Schedule 49 Adjustments (2)	Adjusted (3)	Adjustments (4)	Adjusted (5)
28	Investment Tax Credit – Net	\$	\$	\$	\$	\$
29	Other Tax Deferrals (Specify and List Separately)	_____	_____	_____	_____	_____
30	Total Deferred Income Taxes	=====	=====	=====	=====	=====
31	Total Federal (State) Income Taxes (18 + 30)	=====	=====	=====	=====	=====

\*Separate schedules should be completed for the Federal and State calculations.

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