

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
PADUCAH WATER WORKS AND WEST)	CASE NO.
MCCRACKEN COUNTY WATER DISTRICT FOR)	2021-00374
APPROVAL OF TRANSFER OF MCCRACKEN)	
COUNTY WATER DISTRICT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO PADUCAH WATER WORKS

Paducah Water Works (Paducah Water), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on October, 29, 2021. The Commission directs Paducah Water to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Paducah Water shall make timely amendment to any prior response if Paducah Water obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Paducah Water fails or refuses to furnish all or part of the requested information, Paducah Water 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, Paducah Water shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide a schedule in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible showing that Paducah Water will meet the debt service coverage requirements of its lenders (existing and proposed long-term debt) for the three years following the completion of the proposed merger and assumption of West McCracken County Water District's (West McCracken District) existing long-term debt. Include all calculations, assumptions (customer growth and increases in operating expenses), and work papers used by Paducah Water in its response.

2. Provide a schedule in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible showing Paducah Water's debt service coverage (existing and proposed long-term debt), including full recovery of its depreciation expense (existing plant and the completed project) for the three years following the completion of the proposed merger and assumption of West McCracken District's existing long-term debt. Include all calculations, assumptions (customer growth and increases in operating expenses), and work papers used by Paducah Water in its response.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 15 2021

cc: Parties of Record

*Paducah Water Works
1800 North 8th Street
P. O. Box 2377
Paducah, KY 42001

*Stan Spees
Attorney
330 North 9th Street
Paducah, KENTUCKY 42001

*Honorable W. David Denton
Attorney at Law
Denton Law Firm, PLLC
555 Jefferson Street, Suite 301
P.O. Box 0969
Paducah, KENTUCKY 42002

*West McCracken County Water District
8020 Ogden Landing Road
West Paducah, KY 42086