

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF GREEN-)	CASE NO.
TAYLOR WATER DISTRICT FOR A RATE)	2022-00246
ADJUSTMENT PURSUANT TO 807 KAR 5:076)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO GREEN-TAYLOR WATER DISTRICT

Green-Taylor Water District (Green-Taylor District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due within 14 days of service of this request. The Commission directs Green-Taylor District 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 question to which the response is made and 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

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).

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

Green-Taylor District shall make timely amendments to any prior response if Green-Taylor District 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 Green-Taylor District fails or refuses to furnish all or part of the requested information, Green-Taylor District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Green-Taylor District 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 Green-Taylor District's response to Commission Staff's First Request for Information (Staff's First Request), Item 3.a., Excel Workbook: GT1_3.a-Adjustments.xlsx.

- a. Green-Taylor District reported that it purchased 199,711,000 gallons of water from the city of Greensburg (Greensburg) in the calendar year 2021. Provide legible copies of the Greensburg purchased water invoices received by Green-Taylor District for the period of November 1, 2020 through February 28, 2022.

b. Green-Taylor District reported that it purchased 32,022,770 gallons of water from the Green River Valley Water District (Green River District) in the calendar year 2021. Provide legible copies of the Green River District purchased water invoices received by Green-Taylor District for the period of November 1, 2020 through February 28, 2022.

c. Green-Taylor District reported that it purchased 138,349,000 gallons of water from the city of Campbellsville (Campbellsville) in the calendar year 2021. Provide legible copies of the Campbellsville purchased water invoices received by Green-Taylor District for the period of November 1, 2020 through February 28, 2022.

2. Refer to Green-Taylor District's response to Staff's First Request, Item 8.

a. Explain what is included in the Service Charge's 2,106 occurrences.

b. Provide the item included in the Service Charge and the number of occurrences for each item.

3. Refer to the Commission Staff's Second Request for Information (Staff's Second Request), Item 2a. and Item 2.b. In its responses, Green-Taylor District stated that it would start the interviews to fill the vacant Operator position the week of November 14, 2022.

a. If the vacant Operator position has been filled, provide the employee information as originally requested in Item 1.a.

b. If Green-Taylor District has yet to hire its new Operator, provide the revised date Green-Taylor District expects to fill the vacant Operator position.

4. Refer to Green-Taylor District's response to Commission Staff's Second Request, Item 1 and Item 7. Reconcile the revenue stated in Item 1 with the revenue stated in Item 7.

a. Explain if the revenue from Item 7 for the Meter Reread Charge is in addition to the revenue in Item 1.

b. If the revenue for the Meter Reread Charge is in addition to the revenue stated in Item 1, explain why it isn't included in Item 1.

c. Provide the location in the number of occurrences for the Meter Reread Charge in response to Staff's First Request listing of occurrences.

5. Refer to the PDF named "GT3_1-Cann_Tech_Payment.pdf" filed in Green-Taylor District's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 1.

a. Provide a signed copy of the Agreement on pages 1-3 of the PDF.

b. Reconcile the check in the amount of \$23,750.20 on page 4 with the amount on page 5 of \$29,249.80. Explain the reason for the discrepancy. Provide a copy of the check in the amount noted on page 5 and the invoice for page 4.

c. Confirm that Green-Taylor District paid both amounts to satisfy the Agreement on pages 1-3 of the PDF.

d. Confirm that the amounts paid were listed in the accounts payable for the year 2019 and the year 2020. If not, explain how these expenses were shown on the books. If the amount is in excess of what was owed, explain in detail the reason for the settlement amount.

- e. Provide copies of the original Cann-Tech invoices as originally requested in Staff's Second Request, Item 1.
- f. Explain if Green-Taylor District expects to have any other expenses under this contract.
- g. If so, explain if any of these expenses be capitalized.



Linda C. Bridwell, PE
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Public Service Commission
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DATED DEC 13 2022

cc: Parties of Record

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