

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF UNION)	
COUNTY WATER DISTRICT AND ITS)	
INDIVIDUAL COMMISSIONERS, RAYMOND)	CASE NO.
ARNOLD AND JOYCE GREENWELL, AND)	2023-00120
MANAGER GARY SHEFFER ALLEGED FAILURE)	
TO COMPLY WITH KRS 278.300 AND KRS)	
278.020)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO UNION COUNTY WATER DISTRICT

Union County Water District (Union District), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due on July 3, 2023. The Commission directs Union 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

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).

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.

Union District shall make timely amendment to any prior response if Union District obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Union District fails or refuses to furnish all or part of the requested information, Union 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, Union District shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Regarding the Promissory Note entered with United Community Bank of West Kentucky (United Bank) on August 30, 2021,² provide the following:

² First provided to the Commission in Case No. 2022-00160, *Electronic Application of Union County Water District for an Alternative Rate Adjustment*, Application (filed June 3, 2022) at 52.

a. A copy of the Promissory Note and all other documentation with United Bank;

b. A copy of the any board minutes where the purchase of the office building and financing was approved by the commissioners; and

c. The amortization schedule for the building.

2. Provide an explanation of how Union District assessed the value of the purchased building, including but not limited to the following:

a. Formula used;

b. Any contract for the sale of the building;

c. Any contract for renovations to the building;

d. Description of valuation;

e. Documentation by the utility, of any contractor or engineer consulted for any renovations or sale of the building, as well as any supporting formula, calculation, and resulting price of any renovations for the sale.

3. State whether Union District consulted an attorney before entering into the United Bank loan.

4. Explain the circumstances that led Union District to determine that the United Bank loan was not subject to Commission approval.

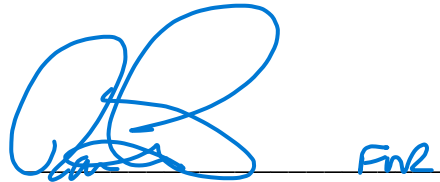
5. Provide the dates of all Commission-conducted training attended by Union District commissioners since January 1, 2017; state whether the training was in person or virtual.

6. Provide the lease or agreement Union District had for the use of the building located at 409 North Court Street, Morganfield, Kentucky previously owned by Union County Fiscal Court. Provide the projected monthly expenses for 409 North Court Street, Morganfield, Kentucky, including but not limited to electric, water, and internet.

7. Provide any signed or executed contracts for improvements or modifications for 409 North Court Street, Morganfield, Kentucky.

9. Provide any written legal opinion relied upon by Union District prior to obtaining financing for 409 North Court Street, Morganfield, Kentucky, as it relates to financing or regulatory approvals.

10. Provide the invoices, receipts, and all other documentation for any improvements and modifications made to 409 North Court Street, Morganfield, Kentucky.

A handwritten signature in blue ink, appearing to be 'Linda C. Bridwell', is written over a horizontal line. To the right of the signature, the initials 'FNL' are written in blue ink.

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

DATED JUN 08 2023

cc: Parties of Record

*Robert K. Miller
Straightline Kentucky LLC
113 North Birchwood Ave.
Louisville, KENTUCKY 40206

*Union County Water District
409 North Court Street
P. O. Box 146
Morganfield, KY 42437

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

*Wm. Clint Prow
Attorney
112 North Broadway
Providence, KENTUCKY 42450

*Rebecca C. Price
Sturgill, Turner, Barker & Moloney
155 East Main Street
Lexington, KENTUCKY 40507

*Stephen Arnett
Arnett & Stearns Law Office
109 South Morgan Street
P. O. Box 419
Morganfield, KENTUCKY 42437

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

*Gary Sheffer
Manager
Union County Water District
409 North Court Street
P. O. Box 146
Morganfield, KY 42437