

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EDMONSON)	CASE NO.
COUNTY WATER DISTRICT FOR A RATE)	2024-00219
ADJUSTMENT PURSUANT TO 807 KAR 5:076)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO EDMONSON COUNTY WATER DISTRICT

Edmonson County Water District (Edmonson District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 8, 2024. The Commission directs Edmonson 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.

Edmonson District shall make timely amendment to any prior response if Edmonson 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 Edmonson District fails or refuses to furnish all or part of the requested information, Edmonson 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, Edmonson 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 Edmonson District's response to Commission Staff's First Request for Information (Staff's First Request), Item 1a, 1a_General_Ledger_2023.xls, rows 17,700 thru 17,761. Provide a copy of the invoices for the 12 transactions greater than \$1,000.

2. Refer to Edmonson District's response to Staff's First Request, Item 1d, 1d_Water_Rate_Model_2024.xlsx, Wages Tab. Also refer to Edmonson District's response to Staff's First Request, Item 7, 7_Employee_Wages_and_Benefits.

a. In Item 7, Employee 103 is stated as a part time employee, however in Item 1d, they are considered a full-time employee with 2,080 hours projected. Confirm if they are a full time or part time employee.

b. In Item 7, Employees 119, 121, 122, 123, and 124 do not have a termination date; however, they are not included in the Item 1d calculation for pro forma wages. Confirm if any of them are employed with Edmonson District, if they need to be added to the calculation, or explain why they should not be included in the pro forma calculation.

c. In Item 1d, Rows 17, 27, 34, and 35, the employees listed do not have an employee number, provide the employee number, and start date.

d. In Item 1d, Rows 4 and 5. Explain why Employees 8 and 13 do not have any hours listed; if they are no longer employed, provide their termination date.

e. In Item 1d, Column H, explain what 2023 Retropay is, how it is calculated, and paid out.

f. In Item 1d, Cell I36, explain what Stand-by pay is, how it is calculated, and paid out.

3. Refer to Edmonson District's response Staff's First Request, Item 6a, 6a_P_&_L_Insurance_Renewal.pdf. Also refer to Item 6b, Insurance_Invoices_Payments.xlsx. In Item 6a, the Expiring Premium is recorded as \$63,843; however, in

Item 6b, the test year Liability and Property Insurance Invoices are \$61,726.41. Reconcile and explain the difference.

4. Refer to Edmonson District's response Staff's First Request, Item 7, 7_Employee_Wages_and_Benefits, Column L, 2023 Total Wages Paid. Also refer to Edmonson District's Response Staff's First Request, Item 9. In the response to Item 7, the total wages paid to employees during the test year is listed as \$1,432,455. However, in the response to Item 9, the Gross Test Year Wages was recorded as \$1,433,358. Reconcile and explain the difference in the two amounts.

5. Refer to Edmonson District's response Staff's First Request, Item 7, 7_Employee_Wages_and_Benefits. Identify and list which employee(s) performed work for both water and sewer divisions.

6. Refer to Edmonson District's response Staff's First Request, Item 14. Confirm the Board members for the Water Division also share responsibilities with the Sewer Division. If not confirmed, explain if the sewer division has its own board members, and if so, provide the names and appointment confirmation from the fiscal court.

7. Refer to the Application, Attachment 4, References, Adjustment C. Also refer to Edmonson District's response Staff's First Request, Item 13, 13_Commissioners_Wages_and_Benefits.xlsx. Adjustment C states the Board or Commissioners is five people, however, according to Item 13 there are only four active members. Explain who replaced Josh Brooks when his term expired August 24, 2024, if anyone.

8. Refer to Edmonson District's response to Staff's First Request, Item 14. In the responses, Edmonson District provided Fiscal Court minutes to support the appointment of the Commissioners. However, it did not supply fiscal court minutes supporting the authorization of compensation levels for the Commissioners. Provide Fiscal Court minutes that authorize each Board member's compensation.

9. Refer to the Application, Exhibit 9, 09b KRWFC Loans.pdf, KRWFC 2013B. Also refer to Edmonson District's Response to Staff's First Request, Item 21. Debt Issuance KRWFC 2013B. In Case 2014-00175² the Commission authorized the issuance of KIA Bonds 2013A in the amount of \$504,000 and 2013B in the amount of \$160,000. However, the response lists the KRWFC Loan 2013B for \$1,960,000. Provide the Commission case number for the approval of the KRWFC 2013B loan.

10. Provide proof of customer notice pursuant to 807 KAR 5:076, Section 5(3).



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

DATED SEP 23 2024

cc: Parties of Record

² Case No. 2014-00175, *Application of Edmonson County Water District, Edmonson, Warren, Grayson and Hart Counties, Kentucky for A Certificate of Public Convenience and Necessity Authorizing Construction of Major Additions and Improvements to its Water System and Seeking Approval of the Issuance of Certain Securities* (Ky. PSC June 27, 2014), Order at 3, ordering paragraph 3.

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

*Kevin Shaw
General Manager
Edmonson County Water District
P. O. Box 208
Brownsville, KY 42210

*Edmonson County Water District
1128 Highway 259N
P. O. Box 208
Brownsville, KY 42210