Ernie Fletcher Governor

LaJuana S. Wilcher, Secretary Environmental and Public Protection Cabinet

Christopher L. Lilly Commissioner Department of Public Protection



Commonwealth of Kentucky
Public Service Commission
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Teresa J. Hill Vice Chairman

August 29 2006

Will Brown, Senior Project Manager Mountain Water District Post Office Box 3157 Pikeville, Kentucky 41502

Re: Case No. 2006-00123

Dear Mr. Brown:

On July 18, 2006, the Commission approved, subject to several conditions, the transfer of certain Mountain Water District ("Mountain District") wastewater facilities and related debt to the City of Pikeville, Kentucky. The Commission required, among other things, that Mountain District file a detailed plant and accumulated depreciation schedule for Utility Plant in Service as of June 30, 2006. On August 7, 2006, Mountain District filed such schedule.

Based upon its review of this schedule, Commission Staff makes the following requests:

- Asset Nos. 32 and 76, which are labeled as Mains, have a useful life of 20 years. Asset No. 100, which is labeled Mossy Bottom Sewer, has a useful life of 40 years. In a previous filing with the Commission, Asset No. 100 was also labeled as Mains. Explain why Mountain District is using different useful lives for these assets.
- The asset descriptions for Asset Nos. 1 through 12, 99, and 113 do not indicate the nature of those assets. Provide a more clear description for these assets.
- The plant schedule shows an accumulated depreciation balance of \$1,439,637 as of January 1, 2006. Mountain District's Annual Report for the Year Ending December 31, 2005, however, shows an accumulated depreciation ending balance of \$1,338,570. Explain the discrepancy between accumulated depreciation on Mountain District's plant schedule and its annual report.



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> Mountain District is depreciating Asset No. 29 using the double declining balance method of depreciation. The Uniform System of Accounts for Sewer Utilities requires that plant be depreciated using the straight-line method. Explain why Mountain District is not using straight-line depreciation for this asset.

Commission Staff respectfully requests that Mountain District respond to these requests within 15 days of the date of this letter. If you have any questions, please call Daniel Hinton of the Commission Staff at (502) 564-3940, extension 276.

Sincerely,

Beth O'Donnell

Executive Director

cc: Case File No. 2006-00123

David E. Spenard, Esq. John N. Hughes, Esq.