

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF GREEN-TAYLOR WATER) CASE NO.
DISTRICT FOR AN ADJUSTMENT OF RATES) 2009-00032

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

Green-Taylor Water District ("Green-Taylor"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the person 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 response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

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

Careful attention should 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.

1. Provide a general ledger for the years 2007 and 2008 showing the account number, account title and all entries to each account. For each entry, show the date paid, vendor name, check number and amount. All accounts should show activity for 12 months.

2. Provide a depreciation lapse schedule for the years 2007 and 2008.

3. Mr. Rhody states in his pre-filed testimony that several operating expenses have increased. Is Green-Taylor proposing any pro forma adjustments?

4. Reconcile the differences in amounts on the Income Statement Summary Current YTD and Comparative YTD for 12/01/08-12/31/08 as filed with the Comparative Operating Statement in the 2008 Annual Report.

5. Show the calculation of Green-Taylor's proposed revenue requirement.

6. Provide a breakdown of the expenses included in the line titled Operational on Green-Taylor's Statement of Revenues, Expenses and Changes in Net Assets.

7. Provide a list of Green-Taylor employees. For each employee, provide their current position, salary, length of service, regular weekly hours worked, test-period pay rates and current pay rates.

8. Provide the type of employee benefits provided for each employee.

9. For each employee, provide the percentage and date of the last wage increase and the date and percentage of the next anticipated increase.

10. Provide a list of all indebtedness, short and long term. For each debt instrument, include the date issued, interest rate and maturity date. Also, provide amortization schedules for all debt.

11. Provide a listing of the type of taxes assessed against the utility and the amounts of each tax for the year 2007 and 2008.

12. Green-Taylor's current tariff shows rates for both a 5/8" X 3/4" meter and a separate 3/4" meter. In the billing analysis Green-Taylor included in its application, only rates for a 3/4" meter are shown and the analysis does not include any billing information for the 5/8" X 3/4" meter. Additionally, in its application, Green-Taylor includes the billing analysis with the proposed rates and shows information for the 5/8" X 3/4" customers but not the 3/4" customers. Please explain the discrepancies and provide billing information for the meter sizes that were not included.

13. Refer to Exhibit 4 of the application, Nonrecurring Charge Cost Justification. For each sheet, provide detailed explanation of labor expense (time and wage) in the field expense and clerical expense sections (example: .5 hours @ \$28.00 per hour).

14. Refer to the pre-filed testimony of Monty Rhody. Mr. Rhody asserts that the reason for the proposed increase is due to increases in operating expenses and a decrease in water sales.

a. Why is it reasonable to increase only the minimum bills as proposed?

b. Mr. Rhody states that the district only wanted to increase the minimum bills so that their larger customers would not be affected as much. Why is it reasonable to impact smaller customers more, considering the nature of the increased expenses?

c. State whether an across-the-board percentage increase to the current rates would be more appropriate than the proposed increase to the minimum bill, considering the increases in expenses and the absence of a cost-of-service study.

15. Provide the test-year billing analysis in Exhibit 9 of the application on a computer disk in Microsoft Excel format, allowing for the review of and unrestricted access to the underlying formulas.



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Public Service Commission
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DATED: SEP - 4 2009

cc: Parties of Record

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