

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF JOANN ESTATES)	
UTILITIES, INC. AND PADUCAH-MCCRACKEN)	
COUNTY JOINT SEWER AGENCY FOR THE)	CASE NO.
APPROVAL OF THE TRANSFER OF)	2018-00347
WASTEWATER COLLECTION SYSTEMS)	
SERVING WILMINGTON CHILES AND JOANN)	
ESTATES SUBDIVISIONS IN MCCRACKEN)	
COUNTY, KENTUCKY)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO JOINT APPLICANTS, JOANN ESTATES UTILITIES, INC.
AND PADUCAH-MCCRACKEN COUNTY JOINT SEWER SYSTEM

Joint applicants, Joann Estates Utilities, Inc. (Joann Estates) and Paducah-McCracken County Joint Sewer System (Paducah-McCracken System) (jointly, Joint Applicants), pursuant to 807 KAR 5:001, are to file with the Commission the original and six copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due on November 9, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

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

Joint Applicants shall make timely amendment to any prior response if they obtain information that 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 Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall 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. When filing a paper containing personal information, Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. State whether notice of the proposed transfer of assets and subsequent rates was provided to customers of Joann Estates. If notice was provided, provide a copy. If notice was not provided, explain why not.

2. Explain why Joann Estates' sewer facility serving the Timberland subdivision was not included in the proposed transfer.

3. Provide the effect upon the average bill for Joann Estates residential customers.

4. Refer to Exhibit A of the Application, Transfer Agreement, Item 2.3, Condition of Facilities and Operation; this section states among other things, that Joann

Estates is in compliance, with the exception of those violations identified on Schedule 2.3 attached hereto. There was no Schedule 2.3 attached. Provide this attachment.

5. Verify that the monthly flat rate of \$34.71 charged by Joann Estates is not based on water usage.

6. Provide the name of the current water provider for the customers of Joann Estates.

7. State whether the current water provider will continue to provide water for the customers of Joann Estates if the proposed transaction is approved.

8. Provide the average monthly water usage of customers of Joann Estates.

9. Provide the calculation for the average monthly bill if the proposed transaction is approved, using the average water usage of customers of Joann Estates and the proposed new rate of \$5.83 per 1,000 gallons..

10. Refer to Exhibit F of the Application, JSA Tariff. Verify that the minimum bill is calculated at \$17.49 for a customer whether they use the 3,000 gallons of water per month or less.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED OCT 29 2018

cc: Parties of Record

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