

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CALDWELL COUNTY WATER)	
DISTRICT FOR APPROVAL TO ENTER INTO A)	
LEASE AGREEMENT WITH THE KENTUCKY)	CASE NO.
ASSOCIATION OF COUNTIES LEASING TRUST)	2019-00311
FOR AN APPROXIMATE PRINCIPAL AMOUNT OF)	
\$1,710,000 FOR THE PURPOSE OF)	
REFINANCING OUTSTANDING OBLIGATIONS)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO CALDWELL COUNTY WATER DISTRICT

Caldwell County Water District (Caldwell District), pursuant to 807 KAR 5:001, is 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 within seven days of the date of this request. 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.

Caldwell District shall make timely amendment to any prior response if Caldwell District 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 Caldwell District fails or refuses to furnish all or part of the requested information, Caldwell 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 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, Caldwell 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 the *Annual Report of Caldwell County Water District to the Public Service Commission of the Commonwealth of Kentucky for the Calendar year Ended December 31, 2017*, page 56 of 66.

a. Caldwell District states that the 18.208 million gallons reported in the category Other Water Uses – Other is the result of sabotage. Provide a detailed explanation of the term sabotage as used by Caldwell District and include an itemized list of the amounts recorded in the category Other Water Uses – Other.

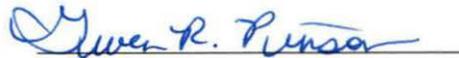
b. Explain why the 18.208 million gallons attributed to sabotage was not reported in the category Water Loss – Other.

c. If the 18.208 million gallons attributed to sabotage were to be classified as Water Loss – Other, recalculate Caldwell District’s line loss percentage for calendar year 2017.

2. Refer to the *Annual Report of Caldwell County Water District to the Public Service Commission of the Commonwealth of Kentucky for the Calendar year Ended December 31, 2018*, page 57 of 67.

a. Caldwell District states that the 5.397 million gallons reported in the category Other Water Uses – Other is the result of sabotage. Provide an itemized list of the amounts recorded in the category Other Water Uses – Other.

b. If the 5.397 million gallons attributed to sabotage were to be classified as Water Loss – Other, recalculate Caldwell District’s line loss percentage for calendar year 2018.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED SEP 23 2019

cc: Parties of Record

*Daniel Briscoe, Jr
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202

*Caldwell County Water District
118 West Market Street
Princeton, KY 42445

*Jimmy Littlefield
Caldwell County Water District
118 West Market Street
Princeton, KY 42445