

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 4 2019

PUBLIC SERVICE  
COMMISSION

In the Matter of:

APPLICATION OF KNOTT COUNTY )  
WATER AND SEWER DISTRICT FOR ) CASE NO. 2019-00268  
AN ALTERNATIVE RATE ADJUSTMENT )

**ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), and submits these Supplemental Data Requests to Knott County Water and Sewer District (hereinafter “KCWSD” or the “District”) to be answered by October 18, 2019, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words “document” or “documents” are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting

records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

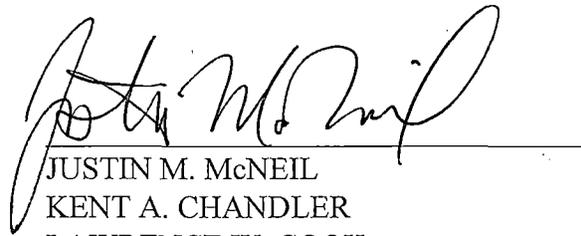
(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read "Justin M. McNeil", is written over a horizontal line. The signature is fluid and cursive.

JUSTIN M. McNEIL  
KENT A. CHANDLER  
LAWRENCE W. COOK  
REBECCA W. GOODMAN  
ASSISTANT ATTORNEYS GENERAL  
700 CAPITOL AVE, SUITE 20  
FRANKFORT, KY 40601-8204  
PHONE: (502) 696-5453  
FAX: (502) 573-1005  
[Justin.McNeil@ky.gov](mailto:Justin.McNeil@ky.gov)  
[Kent.Chandler@ky.gov](mailto:Kent.Chandler@ky.gov)  
[Larry.Cook@ky.gov](mailto:Larry.Cook@ky.gov)  
[Rebecca.Goodman@ky.gov](mailto:Rebecca.Goodman@ky.gov)

Application of Knott County Water and Sewer District for an Alternative Rate Adjustment  
Case No. 2019-00268  
Attorney General's Supplemental Data Requests

1. Refer to KCWSD's responses to the Attorney General's Initial Data Requests, Item 1, subpart a, where the District stated "since the last rate change was in 2011, it is also true that rates will have changed by approximately 80% over a ten year period." Then, refer to KCWSD's responses to the Attorney General's Initial Data Requests, Item 2, subparts a and b, indicating that the District's last rate filing was in 2002 and that the "rates established in Case No. 2002-00292 are the same as KCWSD's current rates."
  - a. Reconcile these two responses.
  - b. Explain what changes to rates were made in 2011 and provide the Commission case docket, if any, in which those changes were made.
2. Refer to KCWSD's responses to the Attorney General's Initial Data Requests, Item 5.
  - a. Further explain the circumstances around KCWSD discovering the finished water meter which that was found to have been producing erroneous readings in 2017.
  - b. Explain how often the finished water meter had been tested in the past.
  - c. Explain whether KCWSD's testing schedule complied with 807 KAR 5:006, Section 26, Inspection of Systems.
  - d. Explain KCWSD's current testing schedule for its system and whether it complies with 807 KAR 5:006, Section 26, Inspection of Systems.
  - e. Explain any changes or improvements made to KCWSD's testing schedule in light of these events.
3. Refer to KCWSD's responses to the Attorney General's Initial Data Requests, Item 6.
  - a. Provide the percentage of any merit-based wage or salary increases awarded to employees over the past three (3) years.
  - b. Explain the process of how the District evaluates whether to award such increases and how much to award.
4. Refer to KCWSD's responses to LCWSD/Hindman's Initial Data Requests, Item 10, *inter alia* pages 8–9, and 17–19 of 69.
  - a. Estimate the percentage of Knott County that is currently served by KCWSD water service.
  - b. Explain the prevalence of county residents who express their desire to receive water service from KCWSD who do not already receive service.
  - c. Explain the extent, if any, of KCWSD's intent to expand distribution lines for water service in its service territory and describe any such projects underway or being planned/discussed.
  - d. Explain the "other efforts" referred to that KCWSD made in the last year to reduce water loss.
  - e. Explain when KCWSD expects its asset management software to be fully updated, and subsequently when it will begin and complete the development of a master infrastructure replacement plan.

Application of Knott County Water and Sewer District for an Alternative Rate Adjustment  
Case No. 2019-00268  
Attorney General's Supplemental Data Requests

5. Explain whether KCWSD has any AMI or AMR meters.
  - a. If so, explain what effect these meters have had on water loss.
  - b. If so, explain what effect these meters have had on operations and maintenance expense.
  - c. If not, explain whether the District has discussed or plans to invest in new meters in the future.

Application of Knott County Water and Sewer District for an Alternative Rate Adjustment  
Case No. 2019-00268  
Attorney General's Supplemental Data Requests

*Certificate of Service and Filing*

Counsel certifies that an original and ten (10) photocopies of the foregoing were served and filed by hand delivery to Gwen R. Pinson, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail to:

L. Allyson Honaker  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, Kentucky 40504

Gerald E. Wuetcher  
Stoll Kennon Ogden PLLC  
300 West Vine Street, Suite 2100  
Lexington, Kentucky 40507-1801

Mark David Goss  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, Kentucky 40504

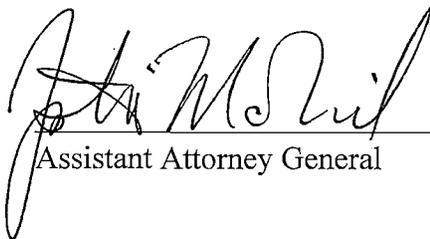
Jeremy R. Morgan  
City of Hindman  
PO Box 496  
Hindman, KY 41822

Jared Salmons  
Knott County Water & Sewer District  
474 Highway 1087 W  
Leburn, KY 41831

Calvin R. Tackett  
40 Main Street  
Whitesburg, KY 41858

Knott County Water & Sewer District  
7777 Big Branch Road  
Vicco, KY 41773

This 4<sup>th</sup> day of October 2019.

  
Assistant Attorney General