

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF CITY OF)	CASE NO.
AUGUSTA REVISING ITS WHOLESALE)	2020-00277
WATER SERVICE RATES)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO CITY OF AUGUSTA

City of Augusta (Augusta), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due by February 24, 2021. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Augusta SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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

Augusta shall make timely amendment to any prior response if Augusta obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Augusta fails or refuses to furnish all or part of the requested information, Augusta 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, Augusta shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Identify the name and title or position of the person or persons who are responsible for directing the activities of counsel in this case, for monitoring time spent by legal counsel, and approving or recommending payment of attorney fees.

2. a. State whether the rates proposed by Augusta include any expenses for the preparation of this case, and if so, identify those expenses and provide detailed invoices for those expenses.

b. Identify all expenses incurred in preparing this case, regardless of whether the expenses were used to calculate Augusta's proposed rates, and provide detailed invoices for those expenses.

3. Refer to Bracken County Water District's (Bracken District) Reply to Augusta's Response to Motion for Ruling, Exhibit A, page 7, Cost of Water Produced, Purchased and Sold.

a. Provide all information relied upon to calculate the rate for Producers stated as \$1.84 per 1,000 gallons in Excel spreadsheet format with all formulas intact and unprotected and all rows and columns fully accessible.

b. Provide all information relied upon to calculate the rate for Sellers stated as \$2.35 per 1,000 gallons in Excel spreadsheet format with all formulas intact and unprotected and all rows and columns fully accessible.

4. Refer to Bracken District's Reply to Augusta's Response to Motion for Ruling, Exhibit A, page 7, Water Loss.

a. This exhibit states you track water loss on a monthly basis; provide the manner that you track water loss.

b. This exhibit states that you have a plan to address water loss; provide the plan.

c. Provide the status of the Master Meter Calibration and Meter Replacement programs as stated as part of the Water Loss Reduction Plan.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED FEB 10 2021

cc: Parties of Record

Case No. 2020-00277

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