

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CAWOOD	)	CASE NO.
WATER DISTRICT FOR AN ALTERNATIVE	)	2020-00311
RATE ADJUSTMENT	)	

NOTICE OF FILING OF COMMISSION STAFF REPORT

Notice is hereby given that, in accordance with the Commission's Order of October 8, 2020, the attached report containing the findings of Commission Staff regarding the Applicant's proposed rate adjustment has been filed in the record of the above-styled proceeding. Pursuant to the Commission's October 8, 2020 Order, Cawood Water District (Cawood District) is required to file written comments regarding the findings of Commission Staff no later than 14 days from the date of this report. Pursuant to the Commission's Orders in Case No. 2020-00085,<sup>1</sup> issued March 16, 2020, and March 24, 2020, Cawood District SHALL NOT FILE the original paper copy at this time, but rather shall file original paper copy within 30 days of the lifting of the current state of emergency. Due to COVID-19, Commission Staff is unable to physically sign this report. When Commission Staff is able to sign this report, a notice of filing with the executed signature page will be made in this case docket.

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<sup>1</sup> 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.



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Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED JAN 22 2021

cc: Parties of Record

Case No. 2020-00311

STAFF REPORT  
ON  
CAWOOD WATER DISTRICT  
CASE NO. 2020-00311

Cawood Water District (Cawood District) is a water utility that owns and operates a water distribution system through which it provides retail water service to approximately 1,627 retail customers that reside in Harlan County, Kentucky.<sup>1</sup> On September 28, 2020, Cawood District filed an application, pursuant to 807 KAR 5:076, requesting to increase its water service rates. To ensure the orderly review of the application, the Commission established a procedural schedule by Order dated October 8, 2020.

To comply with the requirements of 807 KAR 5:076, Section 9, Cawood District based its requested rates on a historical test period that coincides with the reporting period shown in its most recent Annual Report on file with the Commission at the time it filed the Application; the calendar year ended December 31, 2019.

Using its pro forma test-year operations, Cawood District provided evidence that it could justify a revenue increase of \$262,596, or 33.04 percent, to its retail water customers, as shown in the table below.<sup>2</sup> Cawood District proposed to divide the required revenue increase into two phases. The rates proposed by Cawood District for Phase 1 include (1) the Cawood General Service Area, which would increase an average residential customer's bill from \$40.82 to \$47.56, an increase of \$6.74, or 16.51 percent,

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<sup>1</sup> *Annual Report of Cawood Water District to the Public Service Commission for the Calendar Year Ended December 31, 2019 (Annual Report)* at 12 and 49.

<sup>2</sup> Application, Attachment 4.

and (2) the Path Fork Service Area, which would increase an average residential customer's bill from \$49.35 to \$57.50, an increase of \$8.15, or 16.51 percent.<sup>3</sup> The rates proposed by Cawood District for Phase 2 include (1) the Cawood General Service Area, which would increase an average residential customer's bill from \$47.56 to \$54.29, an increase of \$6.73, or 14.15 percent, and (2) the Path Fork Service Area, which would increase an average residential customer's bill from \$57.50 to \$65.64, an increase of \$8.14, or 14.15 percent.<sup>4</sup>

Pro Forma Operating Expenses	\$ 959,125
Plus: Average Annual Principal and Interest Payments	119,191
Additional Working Capital	<u>22,415</u>
Overall Revenue Requirement	1,100,731
Less: Other Operating Revenue	(43,160)
Interest Income	<u>(86)</u>
Revenue Required from Rates	1,057,485
Less: Pro Forma Present Rate Service Revenues	<u>(794,889)</u>
Required Revenue Increase	<u>\$ 262,596</u>
Percentage Increase	<u>33.04%</u>

To determine the reasonableness of the rates requested by Cawood District, Commission Staff (Staff) performed a limited financial review of Cawood District's test-year operations. The scope of Staff's review was limited to determining whether operations reported for the test year were representative of normal operations. Known

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<sup>3</sup> Application, Attachment 1, Customer Notice. Cawood District states that an average Residential Water Customer uses approximately 4,000 gallons monthly.

<sup>4</sup> *Id.*

and measurable changes to test-year operations were identified and adjustments made when their effects were deemed material.<sup>5</sup> Insignificant and immaterial discrepancies were not necessarily pursued or addressed.

This report summarizes Staff's findings. Ariel Miller reviewed the calculation of Cawood District's Overall Revenue Requirement. Eddie Beavers reviewed Cawood District's reported revenues and rate design.

### SUMMARY OF FINDINGS

1. Overall Revenue Requirement and Required Revenue Increase. By applying a Debt Service Coverage (DSC) method, as generally accepted by the Commission, Staff found that Cawood District's Overall Revenue Requirement is \$994,931, and that a \$167,770 revenue increase, or 21.11 percent, to pro forma present rate revenues is necessary to generate the Overall Revenue Requirement.

2. Water Service Rates. Cawood District proposed to increase all of its monthly retail water service rates evenly across the board by approximately 33.04 percent over a phased-in approach over two years. Cawood District has two service areas of its system: the Cawood General Service Area and the Path Fork Service Area. Cawood District has not performed a cost of service study (COSS). In response to Staff's First

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<sup>5</sup> These adjustments are consistent with 807 KAR 5:076, Section 9; See also Case No. 2001-00211, *The Application of Hardin County Water District No. 1 for (1) Issuance of Certificate of Public Convenience and Necessity; (2) Authorization to Borrow Funds and to Issue its Evidence of Indebtedness therefor; (3) Authority to Adjust Rates; and (4) Approval to Revise and Adjust Tariff* (Ky. PSC March 1, 2002); Case No. 2002-00105, *Application of Northern Kentucky Water District for (A) an Adjustment of Rates; (B) a Certificate of Public Convenience and Necessity for Improvements to Water Facilities if Necessary; and (C) Issuance of Bonds* (Ky. PSC June 25, 2003); Case No. 2017-00417, *Electronic Proposed Adjustment of the Wholesale Water Service Rates of Lebanon Water Works* (Ky. PSC July 12, 2018); and Case No. 2019-00080, *Electronic Proposed Adjustment of the Wholesale Water Service Rates of the City of Pikeville to Mountain Water District* (Ky. PSC Dec. 19, 2019).

Request for Information, Cawood District stated that it did not complete a COSS at this time as there has not been any material change in the water system to warrant a COSS.<sup>6</sup>

The Commission has previously found that the allocation of a revenue increase evenly across the board to a utility's rate design is appropriate when there has been no evidence entered into the record demonstrating that this method is unreasonable and in the absence of a COSS. Finding no such evidence in this case, Staff followed the method proposed by Cawood District and allocated the \$167,770 revenue increase across the board to Cawood District's monthly retail and wholesale water service rates.

The rates set forth in the Appendix to this report are based upon the revenue requirement, as calculated by Staff, and will produce sufficient revenues from water sales to recover the \$962,659, Revenue Required from Rates, an approximate 21.11 percent increase. Cawood District requested to increase its rates in a two-phase approach over a two-year period. Staff recommends not applying the two-phase approach and that the Commission adjust the rates once by the 21.11 percent found reasonable by Staff. Staff's recommended increase will cause the rates to increase a typical residential customer's monthly water bill for the Cawood General Service Area from \$40.82 to \$49.45, an increase of \$8.63, or approximately 21.14 percent, and the Path Fork Service Area from \$49.35 to \$59.76, an increase of \$10.41, or approximately 21.09 percent.<sup>7</sup>

3. Rate Case Expense. Staff notes that Cawood District did not make a pro forma adjustment to amortize any costs attributable to the preparation of its application

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<sup>6</sup> Staff's First Request for Information (filed Nov. 4, 2020), Item 6.

<sup>7</sup> The typical residential customer uses approximately 4,000 gallons per month.

for rate adjustment. In its response to the Staff Report, Cawood District should identify any costs that were incurred in preparation for this case.

### PRO FORMA OPERATING STATEMENT

Cawood District's Pro Forma Operating Statement for the test year ended December 31, 2019, as determined by Staff, appears below. Staff notes that Cawood District's 2019 Annual Report reflects Cawood District's unaudited balances and, as a result, were an inaccurate representation of the test period. Staff created an additional column to include the results of the audit adjustments that had a material impact on Cawood District's Pro Forma Income Statement.

	2019 Annual Report	Audit Adjustments	Staff Adjustment	(Ref.)	Pro Forma
<b>Operating Revenues</b>					
Sales of Water	\$ 767,141		\$ 27,748	(A)	\$ 794,889
			(10,330)	(B)	
Other Water Revenues	53,490		(10,974)	(C)	32,186
<b>Total Operating Revenues</b>	<b>820,631</b>		<b>6,444</b>		<b>827,075</b>
<b>Operating Expenses</b>					
<b>Operation and Maintenance Expenses</b>					
Salaries and Wages - Employees	222,817	7,315	31,304	(D)	
			(4,500)	(E)	256,936
Salaries and Wages - Commissioners	6,730				6,730
Employee Pensions and Benefits	75,426		(26,989)	(F)	
			(21,653)	(G)	26,784
Purchased Water	28,727		(4,429)	(H)	24,298
Purchased Power for Pumping	71,818		(11,073)	(H)	60,745
Chemicals	41,745		(6,436)	(H)	35,309
Materials and Supplies	59,009		(10,500)	(E)	
			(29,030)	(I)	19,479
Contractual Services	91,751	(16,877)			74,874
Insurance	25,869		3,433	(J)	29,302
Bad Debt Expense	20,525				20,525
Miscellaneous Expense	131,455		(85,095)	(K)	46,360
<b>Total Operation and Maintenance Expenses</b>	<b>775,872</b>		<b>(164,968)</b>		<b>601,342</b>
Taxes Other Than Income	26,989	(7,315)	2,395	(D)	
					22,069
Depreciation	243,528	(1,409)	(12,205)	(L)	229,914
<b>Total Operating Expenses</b>	<b>1,046,389</b>		<b>(174,778)</b>		<b>853,325</b>
<b>Net Operating Income</b>	<b>(225,758)</b>		<b>181,222</b>		<b>(26,250)</b>
Interest Income	86				86
<b>Income Available to Service Debt</b>	<b>\$ (225,672)</b>		<b>\$ 181,222</b>		<b>\$ (26,164)</b>

(A) Billing Analysis Adjustment. Cawood District proposed to increase its test-year revenues from water sales of \$767,141 by \$27,748 to reflect the current billing analysis provided by Cawood District. Staff finds that Cawood District's adjustment meets the ratemaking criteria of being known and measurable and accepts the adjustment in Pro Forma operations.

(B) Other Water Revenues. In its application, Cawood District made several adjustments to adjust certain Other Operating Revenues and Miscellaneous Service Revenues to their proper balances.<sup>8</sup> Cawood District reduced Other Operating Revenues by \$12,749 to reflect tap fees that were collected during the test period.<sup>9</sup> Cawood District also adjusted revenues by \$2,419 to reconcile miscellaneous revenues with the general ledger. The net result of these adjustments was a decrease to Other Water Revenues of \$10,330. Staff examined Cawood District's 2019 general ledger<sup>10</sup> and determined that the proper balance in the Other Water Revenue account was \$43,160, which included Reconnect Fees of \$12,515 and Service Charges of \$30,645 billed to customers. This results in a total decrease to Other Operating Revenues of \$10,330. Therefore, Staff agrees with Cawood District's proposed adjustment as filed and has reflected the decrease to Other Water Revenues in Pro Forma revenues accordingly.

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<sup>8</sup> Application, Attachment 4, References, Adjustments B and D.

<sup>9</sup> *Id.*, Adjustment C.

<sup>10</sup> Cawood District's Response to Commission Staff's First Data Request (Staff's First Request), Item 1.a., Attachment PSC\_-\_1\_a\_-\_2019\_General\_Ledger.xlsx.

(C) Nonrecurring Charges. Following the Commission’s recent decisions,<sup>11</sup> Staff has reviewed Cawood District’s Nonrecurring Charges. The Commission found that as district personnel are currently paid during normal business hours, estimated labor costs previously included in determining the amount of Nonrecurring Charges should be eliminated from the charges. Staff has reviewed the most recent cost justification information provided in Cawood District’s Alternative Rate Adjustment case, Case No. 2017-00309, and has adjusted these charges by removing Field Labor Costs and Office/Clerical Labor Costs.<sup>12</sup> Such adjustments result in the following revised Nonrecurring Charges:

<u>Nonrecurring Charge</u>	<u>Normal Hours</u>
Meter Reread Charge	\$5.00
Meter Resetting Charge	\$39.00
Meter Test Charge	\$20.00
Meter Turn-On Charge	\$5.00
Returned Check Fee	\$13.00

The adjustments to the Nonrecurring Charges results in a decrease to the charges and an increase to the total revenue requirement of \$10,974 as shown below.<sup>13</sup>

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<sup>11</sup> Case No. 2020-00141, *Electronic Application of Hyden-Leslie County Water District for an Alternative Rate Adjustment* (Ky. PSC Nov. 6, 2020), and Case No. 2020-00167, *Electronic Application of Ohio County Water District for an Alternative Rate Adjustment* (Ky. PSC Dec. 3, 2020), Case No. 2020-00196, *Electronic Application of West Daviess County Water District for an Alternative Rate Adjustment* (Ky. PSC Dec. 30, 2020), and Case No. 2020-00195, *Electronic Application of Southeast Daviess County Water District for an Alternative Rate Adjustment* (Ky. PSC Dec. 30, 2020).

<sup>12</sup> Case No. 2017-00309, *Application of Cawood Water District for an Alternative Rate Adjustment*, (Ky. PSC Dec. 14, 2017).

<sup>13</sup> Cawood District’s Response to Staff’s Second Request for Information (filed Nov. 16, 2020), Item 5.

Nonrecurring Charges				
Charges	Number of Occurences	Utility Pro Forma	Adjustment	Pro Forma
Meter Turn-on	354	\$ 12,390	(10,620)	1,770
Meter Re-read	1	35	(30)	5
Meter Re-setting				
Meter Test Charge				
Returned Check Charge	27	675	(324)	351
Totals		\$ 13,100	(10,974)	\$2,126

(D) Salaries and Wages – New Employee. Cawood District proposed to increase test-year expenses by \$33,699 to reflect the salary of an employee hired subsequent to the test year.<sup>14</sup> Cawood District estimates the total salary for this employee to be \$31,304 annually, and as a result of this annual salary, Cawood District will accrue additional payroll taxes of \$2,395.<sup>15</sup> Staff agrees with Cawood District’s proposed adjustment with respect to the annual cost to hire the additional employee and has increased Salaries and Wages expense by \$31,304 and Taxes Other Than Income by \$2,395.

(E) Tap Fees. Cawood District proposed to decrease test-year expenses by \$15,000 to reflect labor and materials expensed during the test year for the installation of new meter installations. Cawood District estimated the cost to install the new meter installations by the amount of revenue that would be collected to install the taps and proposed to distribute the total between Salaries and Wages expense and Materials and Supplies expense by 30 percent and 70 percent, respectively. Staff concurs with Cawood

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<sup>14</sup> Application, Attachment 4, References, Adjustment F.

<sup>15</sup> *Id.*

District that it is proper to allocate the amount of revenue expected to be collected for the new meter installations in the absence of empirical evidence of the actual cost to install the tap because the collection of tap fees should be cost based recovery of the actual expenses that Cawood District would incur. However, even though Staff agrees that for the purposes of this case that this method of allocation is reasonable, Staff recommends that the Commission make a finding in its Order in this case to require Cawood District to keep its records in the future that are sufficient to determine this information for future rate proceedings. Accordingly, Staff reduced Salaries and Wages expense by \$4,500 and Materials and Supplies expense by \$10,500 to reflect the expenses related to new meter installations.

(F) Taxes Other Than Income. Cawood District proposed to reduce Employee Pensions and Benefits by \$26,989 for payroll taxes that were already reported below Operation and Maintenance Expense. Staff has reconciled the annual report to the general ledger and confirmed that this expense was reported twice. Staff therefore recorded the reduction to Employee Pensions and Benefits in pro forma operations.

(G) Employee Pensions and Benefits. Cawood District proposed in its application to decrease Employee Pensions and Benefits expense by \$21,653 to reflect changes to Cawood District's insurance premiums and to reflect adjustments made to comply with recent Commission precedent regarding 100 percent covered employee health insurance premiums.<sup>16</sup> Staff has examined the evidence provided by Cawood District regarding its health insurance premiums and agrees that a reduction in expenses is required to reflect the reduced premiums associated with its change in insurance

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<sup>16</sup> *Id.*, Adjustment G.

carriers. Additionally, Staff agrees with Cawood District's proposed adjustment to reflect the Bureau of Labor Statistics average employee share of 21 percent applied to the current-year insurance expense based on Commission precedent. Accordingly, Staff reduced Employee Pensions and Benefits expense by \$21,653.

(H) Excess Water Loss. Cawood District's test-year water loss was 30.42 percent.<sup>17</sup> Commission regulation 807 KAR 5:066, Section 6(3), limits water loss to 15 percent for ratemaking purposes unless the Commission finds an alternative level is reasonable. Cawood District proposed to reduce its test-year expenses for Purchased Water, Purchased Power, and Chemicals by \$21,938 to reflect the limitation stated in the regulation.<sup>18</sup> Staff agrees that the regulation has been properly applied by Cawood District in its proposal and therefore reflected each reduction to Pro Forma expenses.

(I) Meter Replacements. Cawood District proposed to reduce expenses by \$29,030 for costs related to the installation of four hundred eighty-six 3/4-inch meters and one 2-inch meter in the test period.<sup>19</sup> Staff agrees that costs related to the installation of meters is a capital item which is properly included in assets on Cawood District's balance sheet and depreciated accordingly. Therefore, Staff reduced Pro Forma expenses by \$29,030.

(J) Insurance. Cawood District proposed to increase Insurance expense by \$3,433 for increases that will be incurred subsequent to the test year in the premium for property and general liability insurance and to workers compensation insurance for both

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<sup>17</sup> Annual Report at 57.

<sup>18</sup> Application, Attachment 4, References, Adjustment I.

<sup>19</sup> *Id.*, Adjustment E.

increases to premium amounts and the addition of the new employee.<sup>20</sup> In response to Staff's First Request, Cawood District provided workpapers that showed the calculation of the increase to workers compensation based on the estimated employee wages for Cawood District's new employee.<sup>21</sup> Staff was able to confirm through the 2020 general ledger the increase to the premiums for both insurance accounts.<sup>22</sup> Accordingly, Staff increased Insurance expense by \$3,433.

(K) Miscellaneous Expenses. Staff requested that Cawood District provide a reconciliation of account 675 – Miscellaneous Expense as reported on Cawood District's Annual Report with its 2019 general ledger provided in response to Staff's First Request for Information. According to the response, Cawood District included in Miscellaneous Expense \$41,745 for Chemicals and \$43,350 for Materials and Supplies – Plant expense. Staff determined from its reconciliation of the Annual Report to Cawood District's general ledger that Cawood District erroneously included these amounts both in 675 – Miscellaneous Expense and in Account 618 – Chemicals and Account 620 – Materials and Supplies and therefore Miscellaneous Expenses are overstated by \$85,095. Staff reduced Miscellaneous Expense to correct this error.

(L) Depreciation. Cawood District proposed to decrease test-year Depreciation expense by \$12,205 to reflect adjustments to the lives of certain assets that fall outside the ranges recommended by the National Association of Regulatory Utility Commissioners (NARUC) in its report published in 1979 titled *Depreciation Practices for*

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<sup>20</sup> *Id.*, Adjustment J.

<sup>21</sup> Response to Staff's First Request, Item 3, Attachment PSC\_3\_-\_pro\_forma\_adjustments.xlsx.

<sup>22</sup> *Id.*, Item 1.a., Attachment PSC\_-\_1\_a\_2020\_General\_Ledger\_as\_of\_9-30-2020.xlsx. See also, Attachment PSC\_-\_1\_a\_-\_2019\_General\_Ledger.xlsx.

*Small Water Utilities* (NARUC Study).<sup>23</sup> When no evidence exists to support a specific life that is outside the NARUC ranges, the Commission has historically used the midpoint of the ranges included in the NARUC Study to depreciate utility plant. Upon examination, Staff found that the adjustments proposed by Cawood District were properly aligned with the lives presented in the NARUC Study and were therefore reasonable for ratemaking purposes. Accordingly, Staff reduced Depreciation expense by \$12,205.

OVERALL REVENUE REQUIREMENT AND REQUIRED REVENUE INCREASE

By applying a DSC method, Staff determined Cawood District’s Overall Revenue Requirement to be \$994,931. Staff calculated a revenue increase of \$167,770, or 21.11 percent, is necessary to generate the Overall Revenue Requirement. A comparison of Cawood District’s and Staff’s calculation of the Overall Revenue Requirement and the Required Revenue Increase using a DSC method is shown below.

	Cawood District	Staff
Pro Forma Operating Expenses	\$ 959,125	\$ 853,325
Plus: Average Annual Principal and Interest Payments	119,191	119,191 (1)
Additional Working Capital	22,415	22,415 (2)
	1,100,731	994,931
Overall Revenue Requirement	1,100,731	994,931
Less: Other Operating Revenue	(43,160)	(32,186)
Interest Income	(86)	(86)
	1,057,485	962,659
Revenue Required from Rates	1,057,485	962,659
Less: Pro Forma Present Rate Service Revenues	(794,889)	(794,889)
	\$ 262,596	\$ 167,770
Required Revenue Increase	\$ 262,596	\$ 167,770
Percentage Increase	33.04%	21.11%

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<sup>23</sup> Application, Attachment 4, References, Adjustment K.

(1) In its application, Cawood District proposed to include in its revenue requirement the three-year average of its annual principal and interest payments on its bonds payable to the USDA Rural Development (RD) and for a note payable to Monticello Bank. The three-year average of the principal and interest payments Cawood District will be required to make for the years 2021 through 2023 is \$119,191.<sup>24</sup> Staff agrees that the principal and interest payments included in the revenue requirement calculation are representative of the bond payment schedules and amortization schedule of the note payable to Monticello Bank provided in Cawood District's application and has therefore included it in the calculation of the revenue requirement.<sup>25</sup>

(2) Cawood District included in its calculation of the revenue requirement \$22,415 for an additional working capital component that it states is required by Cawood District's bond resolutions.<sup>26</sup> The DSC method, as historically applied by the Commission, includes an allowance for additional working capital that is equal to the minimum net revenues required by a district's lenders that are above its average annual debt payments. RD requires that Cawood District charge rates that produce net revenues that are at least 120 percent of its average annual debt payments. Following the Commission's historic practice, Staff agrees with Cawood District's proposed calculation of additional working capital on its RD bonds. Therefore, Staff included \$22,415 in its calculation of the revenue requirement for additional working capital.

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<sup>24</sup> *Id.*, Attachment 4, Table B.

<sup>25</sup> *Id.*, Attachment 9.

<sup>26</sup> *Id.*, Attachment 4, Table B.

## Signatures

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Prepared by: Ariel Miller  
Revenue Requirements Branch  
Division of Financial Analysis

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Prepared by: Eddie Beavers  
Rate Design Branch  
Division of Financial Analysis

APPENDIX

APPENDIX TO A STAFF REPORT OF THE KENTUCKY PUBLIC SERVICE  
COMMISSION IN CASE NO. 2020-00311 DATED JAN 22 2021

Monthly Water Rates

Cawood General Service Area

First 2,000 Gallons	\$29.53	Minimum Bill
Next 8,000 Gallons	0.00996	Per Gallon
Over 10,000 Gallons	0.00710	Per Gallon

Path Fork Service Area

First 2,000 Gallons	\$33.68	Minimum Bill
Next 8,000 Gallons	0.01304	Per Gallon
Over 10,000 Gallons	0.01017	Per Gallon

Nonrecurring Charges

Meter Reread Charge	\$5.00
Meter Resetting Charge	39.00
Meter Test Charge	20.00
Meter Turn-On Charge	5.00
Returned Check Charge	10.25

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