

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF THE)	
WESTERN PULASKI COUNTY WATER)	
DISTRICT FOR THE ISSUANCE OF A)	
CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY TO CONSTRUCT A WATER)	CASE NO.
SYSTEM IMPROVEMENTS PROJECT AND AN)	2020-00331
ORDER AUTHORIZING THE ISSUANCE OF)	
SECURITIES PURSUANT TO THE)	
PROVISIONS OF KRS 278.020, KRS 278.300)	
AND 807 KAR 5:001)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO WESTERN PULASKI COUNTY WATER DISTRICT

Western Pulaski County Water District (Western Pulaski District), 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 within 14 days of the date of this request. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Western Pulaski District 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.

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.

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.

Western Pulaski District shall make timely amendment to any prior response if Western Pulaski District 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 Western Pulaski District fails or refuses to furnish all or part of the requested information, Western Pulaski 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, Western Pulaski 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 Western Pulaski District's 2019 Annual Report, page 57. Total Other Water Used, line 21, lists 158,885,000 gallons, which equates to 29.30 percent of the water purchased by Western Pulaski District.²

a. Provide a detailed explanation of how the amounts were determined for each of the categories listed as Other Water Used.

b. Provide copies of all documents relied upon to support the amounts of water usage for each of the categories listed as Other Water Used.

c. Provide an explanation for the amount listed in the category Other-Other Usage as requested in the 2019 Annual Report.

d. In the event that any of the usage is estimated, provide the basis for the amount of the estimate.

e. Provide a description of Western Pulaski District's past efforts to reduce system usage, and describe Western Pulaski District's future plans to reduce water loss.

2. Confirm that Western Pulaski District does not propose to increase its water service rates to its customers as a result of the proposed project.

3. Provide Western Pulaski District's depreciation schedule for all of its assets for the period ending December 31, 2019.

4. Provide a copy of a current amortization schedule for each of Western Pulaski District's outstanding bond issuances, promissory notes, and debt instruments.

² *Annual Report of Western Pulaski County Water District to the Public Service Commission for the Calendar Year Ended December 31, 2019* at 57, line 21 divided by line 4.

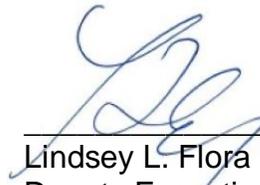
5. Provide a schedule in Excel spreadsheet format showing that Western Pulaski District met the debt service coverage requirements of its lenders in calendar years 2017, 2018, and 2019.

6. Provide a schedule in Excel spreadsheet format showing that Western Pulaski District will meet the debt service coverage requirements of its lenders (existing and proposed long-term debt) for the three years following the completion of its proposed construction project. Include all calculations, assumptions (customer growth and increases in operating expenses), and workpapers used by Western Pulaski District in its response.

7. Provide a schedule in Excel spreadsheet format showing Western Pulaski District's debt service coverage (existing and proposed long-term debt), including full recovery of its depreciation expense (existing plant and the completed project) for the three years following the completion of its proposed construction project. Include all calculations, assumptions (customer growth and increases in operating expenses), and workpapers used by Western Pulaski District in its response.

8. Provide a copy of Western Pulaski District's general ledger for the calendar year ended December 31, 2019.

9. Provide Western Pulaski District's adjusted trial balance showing unaudited account balances, audit adjustments, and audited balances for the calendar year ended December 31, 2019.



Lindsey L. Flora
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Public Service Commission
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DATED NOV 20 2020

cc: Parties of Record

Case No. 2020-00331

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