

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC INVESTIGATION INTO)	
MILBURN WATER DISTRICT TO DETERMINE)	
THE FEASIBILITY OF MERGER WITH A)	CASE NO.
PROXIMATE UTILITY PURSUANT TO KRS)	2021-00341
74.361 OR ABANDONMENT PURSUANT TO KRS)	
278.020(6), KRS 278.021)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO GRAVES COUNTY WATER DISTRICT

Graves County Water District (Graves District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 29, 2024. The Commission directs Graves District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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

Graves District shall make timely amendment to any prior response if Graves District obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Graves District fails or refuses to furnish all or part of the requested information, Graves 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 and scanned 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, Graves 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. Provide the following information regarding Graves District's Operations, Maintenance and Administration:

a. Provide the number of full time equivalents (FTEs) that support Graves District for operators, field staff, administrative, and managerial. FTEs references may be reported down to .25 increments.

b. Describe how Graves District ensures that each required function is performed in the event of the primary employee/contractor's absence.

2. Provide the following information regarding Graves District's water loss surcharge and spending. Refer to Graves District's Annual Reports, Water Operating Revenue sheets in general that were filed with the Commission. Also refer to Graves District's audited financial statements that were filed with the Commission.

a. State the specific line description where the water loss surcharge is reported in both the Annual Reports and the audited financial statements and provide the amount for each year from 2019 through 2022.

b. Provide the dollar amount of water loss surcharge spending that was capitalized during each of 2019 through 2022.

c. Confirm that the lease for a hydro excavator that is financed through Crossroads bank is recorded as an operating lease in Graves District's audited financial statements.

3. Refer to the Graves District's Annual Reports that were filed with the Commission for the years ended December 31, 2021, and 2022. Selected water statistics data and purchased water cost is provided in the table below.

Description	2018	2019	2020	2021	2022
Gallons Produced ('000)	264,951	229,856	196,589	166,255	28,681
Gallons Purchased	125,692	165,996	161,276	172,965	360,631
Total Supply	<u>390,643</u>	<u>395,852</u>	<u>357,865</u>	<u>339,220</u>	<u>389,312</u>
Purchased Water Dollars	<u>\$ 301,205</u>	<u>\$ 301,205</u>	<u>\$ 301,205</u>	<u>\$ 301,205</u>	<u>\$ 361,579</u>
Unit Cost	<u>\$ 2.40</u>	<u>\$ 1.81</u>	<u>\$ 1.87</u>	<u>\$ 1.74</u>	<u>\$ 1.00</u>

a. Confirm that gallons produced and purchased are correct as listed for 2022.

b. If the amounts are correct as stated, describe the reason for the change in production versus purchase mix and if the change is permanent or temporary.

If temporary, state when the mix will return to its historical amounts.

c. Describe the pricing methodology for the sale of water from Mayfield Electric & Water to Graves District.



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

DATED MAR 15 2024

cc: Parties of Record

*Graves County Water District
P. O. Box 329
301 East Broadway
Mayfield, KY 42066

*Milburn Water District
7731 State Route 80 East
Arlington, KY 42021

*Graves County Water District
Graves County Water District
P. O. Box 329
301 East Broadway
Mayfield, KY 42066

*Milburn Water District
Milburn Water District
7731 State Route 80 East
Arlington, KY 42021

*Donna Curtsinger
Milburn Water District
7731 State Route 80 East
Arlington, KY 42021

*Glenn D. Denton
Denton Law Firm, PLLC
555 Jefferson Street, Suite 301
P.O. Box 0969
Paducah, KENTUCKY 42002

*Gerald E Wuetcher
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Holly M. Homra
Denton Law Firm, PLLC
555 Jefferson Street, Suite 301
P.O. Box 0969
Paducah, KENTUCKY 42002

*Michael W Hogancamp
Calisle County Attorney
Courthouse, 985 US Highway 62, Suite
P.O. Box 249
Bardwell, KENTUCKY 42023