

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PURCHASED WATER)	CASE NO.
ADJUSTMENT FILING OF HENDERSON)	2022-00034
COUNTY WATER DISTRICT)	

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

Henderson County Water District (Henderson District), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on April 14, 2023. The Commission directs Henderson 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.

Henderson District shall make timely amendment to any prior response if Henderson 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 Henderson District fails or refuses to furnish all or part of the requested information, Henderson 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, Henderson District shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide the date that Henderson District first engaged Kentucky Rural Water Association (KRWA) to prepare a rate study to support an Alternative Rate Filing (ARF) application.

2. State the name of the person or persons with KRWA that Henderson District communicated with to prepare the rate study.

3. Provide all documentation of any communications that Henderson District had with persons with KRWA regarding the preparation of the rate study.
4. State the date that the rate study will be completed and provide any documentation of this.
5. State the date that Henderson District began work on the ARF application.
6. Explain in detail all of the steps taken and information obtained by Henderson District to date in furtherance of completing the ARF application.
7. Provide the basis for Henderson District's assertion that it can have the ARF application filed by April 11, 2023.
8. Provide the position descriptions of the three employees that Henderson District lost and the dates in which those positions became open.
9. State whether or not the three employees that Henderson District lost had done any work on the preparation of the ARF application and describe the work done by the employee.
10. State the name of the current employees assigned to work on the ARF application and describe in what manner they will be assisting with the ARF application.
11. Provide the position descriptions of all persons that are still currently employed by Henderson District.
12. Provide the reasons why the three open positions have not yet been filled.
13. Give an estimation as to when Henderson District will have the three open positions filled.



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

DATED MAR 23 2023

cc: Parties of Record

Case No. 2022-00034

*J. Christopher Hopgood
Dorsey, Gray, Norment & Hopgood
318 Second Street
Henderson, KENTUCKY 42420

*Henderson County Water District
655 South Main Street
P. O. Box 655
Henderson, KY 42419-0655

*Pete Conrad
Superintendent
Henderson County Water District
655 South Main Street
P. O. Box 655
Henderson, KY 42419-0655