

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KIRKSVILLE WATER ASSOCIATION, INC. AND)	
ITS INDIVIDUAL DIRECTORS, ARMON)	
SANDERS, WAYNE LONG, ALFRED WINKLER,)	CASE NO.
RANDAL WEBB, AND BOBBY POWELL, AND)	2022-00197
MANAGER MIKE AGEE ALLEGED FAILURE TO)	
COMPLY WITH KRS 278.300 AND KRS 278.020)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KIRKSVILLE WATER ASSOCIATION

Kirksville Water Association (Kirksville Water), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on September 26, 2022. The Commission directs Kirksville Water 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.

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

Please refer to 807 KAR 5:001 Section 13 for confidential filing procedures, if applicable.

1. Refer to Kirksville Water's Response, page 6. Provide an explanation as to how the value of the territorial sale was determined, including but not limited to the following:

- a. Formula used;
- b. Any contract for the sale of the territory;

- c. Any contract for the engineer for the project;
 - d. Description of valuation;
 - e. Documentation by the utility, developer and the engineer consulted for the project or sale supporting the formula, calculation, and resulting price.
2. Provide the lease or agreement Kirksville Water had for the use and co-location of the building the utility shared with Madison County Utilities District.
3. Provide the projected monthly expenses for 1613 Foxhaven Dr., including but not limited to electric, water, and internet.
4. In reference to 1613 Foxhaven Dr.:
- a. Provide any signed or executed contracts for improvements or modifications for the property;
 - b. Provide an itemized list of all expenditures for the building.



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

DATED SEP 07 2022

cc: Parties of Record

*Kirksville Water Association, Inc.
1613 Foxhaven Drive
P. O. Box 1150
Richmond, KY 40475

*Honorable Jud Patterson
Patterson Law Office, PLLC
228A. West Main Street
P.O. Box 825
Richmond, KENTUCKY 40475

*Bobby W Powell
Kirksville Water Association, Inc.
1613 Foxhaven Drive
P. O. Box 1150
Richmond, KY 40475

*Armon Sanders
President
Kirksville Water Association, Inc.
1613 Foxhaven Drive
P. O. Box 1150
Richmond, KY 40475

*Wayne Long
Kirksville Water Association, Inc.
1613 Foxhaven Drive
P. O. Box 1150
Richmond, KY 40475

*Randal Webb
Kirksville Water Association, Inc.
1613 Foxhaven Drive
P. O. Box 1150
Richmond, KY 40475

*Mike Agee
Kirksville Water Association, Inc.
1613 Foxhaven Drive
P. O. Box 1150
Richmond, KY 40475

*Alfred Winkler
Kirksville Water Association, Inc.
1613 Foxhaven Drive
P. O. Box 1150
Richmond, KY 40475