

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MOUNTAIN	)	CASE NO.
WATER DISTRICT FOR A GENERAL	)	2022-00366
ADJUSTMENT OF WATER RATES	)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION  
TO MOUNTAIN WATER DISTRICT

Mountain Water District (Mountain District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than August 25, 2023. The Commission directs Mountain District to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

---

<sup>1</sup> 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.

Mountain District shall make timely amendment to any prior response if Mountain 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 Mountain District fails or refuses to furnish all or part of the requested information, Mountain 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, Mountain 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 the response to Commission Staff's Second Request for Information, Item 2. Provide an unredacted version of the invoices for dental insurance that shows the allocation of employee's premiums between the water and sewer division.

2. Refer to the table introduced by Mountain District at the hearing as Exhibit No. 2. Provide a description for Asset No. 330-4110.

3. Refer to the Application, Exhibit 17, Cost of Service Study, Average Unit Costs, page 28 of 30. Provide an updated Average Unit Costs page, per Connie Allen's testimony at the hearing that the calculation(s) was performed incorrectly.

4. Explain where the water division's 81 percent portion of the rate study performed by Connie Allen, P.E., was accounted for and recorded in the Statement of Adjusted Operating Expenses for the water division.

5. Refer to the Application, Exhibit 6, Statement of Adjusted Operations. Confirm if the \$110,120 Insurance- General Liability contains property insurance. If so, provide a copy of the separate test year invoices for General Liability Insurance, and Property Insurance. If Mountain District is unable to provide separate invoices, explain the amount that Mountain District water division paid for both General Liability Insurance and Property Insurance separately.



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

DATED   AUG 18 2023  

cc: Parties of Record

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

\*Roy Sawyers  
Mountain Water District  
P. O. Box 3157  
Pikeville, KY 41502

\*Mountain Water District  
6332 Zebulon Highway  
P. O. Box 3157  
Pikeville, KY 41502-3157

\*Tammy Olson  
Mountain Water District  
P. O. Box 3157  
Pikeville, KY 41502