

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NORTH	)	CASE NO.
MERCER WATER DISTRICT FOR A RATE	)	2023-00185
ADJUSTMENT PURSUANT TO 807 KAR 5:076	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO NORTH MERCER WATER DISTRICT

North Mercer Water District (North Mercer 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 14, 2024. The Commission directs North Mercer 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

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<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.

North Mercer District shall make timely amendment to any prior response if North Mercer 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 North Mercer District fails or refuses to furnish all or part of the requested information, North Mercer 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, North Mercer 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 unredacted version of attachment 8\_NMWD\_Commissioners\_WAGE.pdf provided in North Mercer District's response to Commission Staff's First Request for Information (Staff's First Request), Item 8.

2. North Mercer District's response to Staff's First Request, Item 10 is nonresponsive in part. Provide training records for each Board of Commissioner's

(Board) member for 2022, or if unable to provide the requested records, provide an explanation why the records are unavailable.

3. Refer to North Mercer District's response to Staff's First Request, Item 8, 8\_NMWD\_Commissioners\_WAGE.pdf. Provide documentation from the Fiscal Court that authorizes any benefits provided to Board members outside of annual wages.

a. If there are any benefits provided to Board members outside of annual wages, list the benefits and monetary value for the test year for each Board member.

b. Provide copies of benefits invoices with Commissioners' names unredacted for 2022 and 2023.

4. Refer to North Mercer District's response to Staff's First Request, Item 4, 4\_NMWD\_INVOICES\_OF\_BENEFITS.pdf. Provide current premiums for Full-time Employees, excluding Commissioners, for Healthcare, Dental, Vision, Life, and Disability.

5. Refer to North Mercer District's response to Staff's First Request, Item 15.

a. Provide the Cost Justification Sheet for the Meter Reread Charge listed in North Mercer District's Tariff on file.

b. Explain the lack of providing the Cost Justification Sheet for this charge.

6. Refer to Application, Schedule of Adjusted Operations (SAO) and North Mercer District's response to Staff's First Request, Item 1a, 1\_a\_2022\_NMWD\_Ledger\_Analysis.pdf. Most of the general ledger accounts for the test year do not tie to the SAO in the application. Provide a cross reference that points each

2022 general ledger account to each revenue and each expense line in the SAO and reconcile each amount that does not match.

7. Refer to North Mercer District's response to Staff's First Request, Item 5, 5\_employee\_information.xlsx and North Mercer District's response to Staff's First Request, Item 11a, 1\_d\_2022 TY North Mercer Rate Study.xlsx. Item 5, 5\_employee\_information.xlsx, states that North Mercer District has 13 employees as of January 8, 2024, and Item 11a, 1\_d\_2022 TY North Mercer Rate Study.xlsx, states that North Mercer District has 12 employees.

a. State which is correct and explain the discrepancy.

b. If Item 5, 5\_employee\_information.xlsx, is the correct employee count provide new adjustments with calculations for the additional employee not included in Item 11a, the rate study. Provide in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

8. Refer to North Mercer District's response to Staff's First Request, Item 12, 12\_NMWD\_COST\_OF\_WATER\_2023.xlsx. Provide the 2022 test year water purchases by supplier.

9. Refer to North Mercer District's response to Staff's First Request, Item 11a, 1\_d\_2022\_TY\_North\_Mercer\_Rate\_Study.xlsx, tab ExBA. Provide the calculation of the \$154,774 adjustment in the billing analysis.



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DATED FEB 29 2024

cc: Parties of Record

Case No. 2023-00185

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