

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MUHLENBERG)	
COUNTY WATER DISTRICT #3 FOR AN)	CASE NO.
ALTERNATIVE RATE ADJUSTMENT PURSUANT)	2023-00400
TO 807 KAR 5:076)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO MUHLENBERG COUNTY WATER DISTRICT #3

Muhlenberg County Water District #3 (Muhlenberg District #3), 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 6, 2024. The Commission directs Muhlenberg District #3 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.

Muhlenberg District #3 shall make timely amendment to any prior response if Muhlenberg District #3 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 Muhlenberg District #3 fails or refuses to furnish all or part of the requested information, Muhlenberg District #3 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, Muhlenberg District #3 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 Muhlenberg District #3's response to Commission Staff's First Request for Information (Staff's First Request), Item 8, 8_Board_Members.xlsx.

- a. Describe the insurance coverage that is provided to Muhlenberg District #3's Board of Commissioners (Board).

b. Provide the specific monetary amounts of benefits by category provided to Muhlenberg District #3's Board during the test year. State whether benefits are single or family coverage.

c. Provide documentation from fiscal court approving each of the benefits for Muhlenberg District #3 Board.

2. Provide the following information with current medical and dental insurance premiums:

		Medical Insurance		
Position	Job Title	Single or Family Coverage	Monthly Premium	Annual Premium
1	General Manager			
2	Office Manager			
3	Billing Clerk			
4	Utility Clerk			
5	Superintendent			
6	Field Operator			
7	Field Operator			
8	Billy Holland			
9	Donald Garrett			
10	Donald Doss			
		Total		

		Dental Insurance		
Position	Job Title	Single or Family Coverage	Monthly Premium	Annual Premium
1	General Manager			
2	Office Manager			
3	Billing Clerk			
4	Utility Clerk			
5	Superintendent			
6	Field Operator			
7	Field Operator			
8	Billy Holland			
9	Donald Garrett			
10	Donald Doss			
		Total		

3. Refer to Muhlenberg District #3's response to Staff's First Request, Item 5, 5_Total_Wages_Paid.xlsx, and Item 11a, Rate_Study_Muhlenberg_No_3.xlsx. Provide the current wages and annual hours for employees by position and title.

4. Refer to Muhlenberg District #3's response to Staff's First Request, Item 3, 3_Benefits_Description.pdf.

a. Confirm that Muhlenberg District #3 is a participant in County Employees Retirement System (CERS). If not confirmed, provide the name of the utility provided retirement plan, if any.

b. Describe benefit No. 7, Kentucky Public Pension Retirement.

5. Refer to Muhlenberg District #3's response to Staff's First Request, Item 9, 9_Board_Pay_Approval.pdf. This document does not provide the requested information and is, therefore, considered nonresponsive. Provide the fiscal court minutes approving specific monetary salaries for Muhlenberg District #3's Board or provide a statement as to why this information cannot be provided.

6. Refer to Muhlenberg District #3's response to Staff's First Request, Item 11a, Rate_Study_Muhlenberg_No_3.xlsx, Tab ExBA. Provide the 2022 monthly billing registers for Residential, Commercial, and Wholesale.

7. Refer to the Application filed December 12, 2023, and the Revised_Customer_Notice.pdf., filed December 20, 2023. Explain whether Muhlenberg District #3 is requesting to establish a Wholesale Rate in this case. If so, explain why this intention was not listed in the Reasons for Application. If not, explain why a Wholesale Rate is listed several times in the application.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED FEB 21 2024

cc: Parties of Record

Case No. 2023-00400

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