

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESAL E )  
WATER SERVICE RATES OF THE CITY OF ) CASE NO. 2002-00022  
PIKEVILLE, KENTUCKY )

ORDER

The city of Pikeville, Kentucky ( Pikeville ) has submitted proposed revision to its existing rates for wholesale water service to public utilities. Pikeville proposes that these revisions become effective on and after January 21, 2002. Mountain Water District ( Mountain District ) has moved to intervene in any Commission proceedings on the proposed rate revisions.

Having considered the proposed rate revisions and being otherwise sufficiently advised, the Commission finds that, pursuant to KRS 278.190, further proceedings are necessary to determine the reasonableness of the proposed rate revision. The Commission further finds that Mountain District s intervention is likely to present issues or to develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting this proceeding.

IT IS THEREFORE ORDERED that:

1. Pikeville s proposed rate revision is suspended for five months from January 21, 2002 to June 20, 2002.
2. Mountain District s motion for leave to intervene in this matter is granted.

3. The procedural schedule set forth in Appendix A to this Order shall be followed.

4. All interrogatories and requests for production of documents shall be appropriately indexed. All responses shall include the name of the witness who will be responsible for responding to the questions related to the information provided, with copies to all parties of record and 6 copies to the Commission.

5. At any hearing in this matter, neither opening statements nor summarization of direct testimony shall be permitted.

6. Motions for extensions of time with respect to the schedule herein shall be made in writing and will be granted only upon a showing of good cause.

7. All documents that this Order requires to be filed with the Commission shall be served upon all other parties.

8. To be timely filed with the Commission, a document must be received by the Secretary of the Commission within the specified time for filing except that any document shall be deemed timely filed if it has been transmitted by United States express mail, or by other recognized mail carriers, with the date the transmitting agency received said document from the sender noted by the transmitting agency on the outside of the container used for transmitting, within the time allowed for filing.

9. Service of any document or pleading shall be made in accordance with Administrative Regulation 807 KAR 5:001, Section 3(7), and Kentucky Civil Rule 5.02.

10. Pikeville shall, no later than February 22, 2002, file with the Commission the original and 6 copies of the information listed in Appendix B, with a copy to all parties of record. Each copy of the requested information shall be placed in a bound

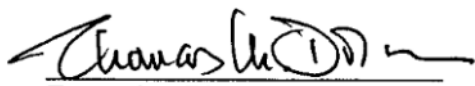
volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Pikeville shall include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention shall be given to copied material to ensure its legibility.<sup>1</sup>

11. Nothing contained herein shall prevent the Commission from entering further Orders in this matter.

Done at Frankfort, Kentucky, this 18<sup>th</sup> day of January, 2002.

By the Commission

ATTEST:



Executive Director

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<sup>1</sup> In City of Pikeville, Kentucky, Case No. 2000-540 (Ky. P.S.C. Oct. 8, 2001), the Commission rejected Pikeville's proposed rate revision because the Pikeville City Commission had not authorized that revision. In our Order rejecting the proposed rate, we stated that should Pikeville within 60 days make a rate filing that has been properly authorized by the Pikeville City Commission, the record of this proceeding should be incorporated by reference into the record of any new proceeding. Pikeville did not make its current filing with 60 days of that Order. Accordingly, we will not permit Pikeville to respond to discovery requests by reference to documents submitted in Case No. 2000-540.

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE  
COMMISSION IN CASE NO. 2002-00022 DATED January 18, 2002

Pikeville shall file its response to the Commission's request  
for information no later than ..... 02/22/2002

Intervenors and Commission Staff shall serve their first set of inter-  
rogatories and requests for production of documents upon Pikeville  
no later than ..... 03/08/2002

Pikeville shall file with the Commission and serve upon all parties  
of record and Commission Staff its responses to the first set of  
interrogatories and requests for production of documents no later than..... 03/22/2002

Intervenors and Commission Staff shall serve their second set of inter-  
rogatories and requests for production of documents upon Pikeville  
no later than ..... 04/05/2002

Pikeville shall file with the Commission and serve upon all parties  
of record and Commission Staff its responses to the second set of  
interrogatories and requests for production of documents no later than..... 04/19/2002

Intervenor testimony, if any, shall be filed with the Commission  
and served upon all parties of record in verified prepared form  
no later than ..... 04/26/2001

Parties and Commission Staff shall serve interrogatories and  
requests for production of documents upon Intervenors no later than ..... 05/10/2001

Intervenors shall file with the Commission and serve upon all other parties  
of record and Commission Staff their responses to interrogatories and  
requests for production of documents no later than ..... 05/24/2001

Public Hearing is to held at the Commission's offices at 211 Sower  
Boulevard, Frankfort, Kentucky, for the purpose of cross-examination  
of witnesses ..... To Be Announced

## APPENDIX B

### APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2002-00022 DATED January 18, 2002

1. Provide in written verified form the direct testimony of each witness that Pikeville intends to call at the scheduled hearing in this matter.
2. Provide the independent auditor s reports for Pikeville s water and sewer operations for the fiscal years ending June 30, 1999, June 30, 2000, and June 30, 2001.
3.
  - a. State the test period upon which Pikeville bases its proposed rate adjustment.
  - b. Explain why this test period was chosen.
4. Provide the general ledgers for Pikeville s water and sewer operations for the proposed test period and the most recently concluded fiscal year. These general ledgers shall include all check registers and spreadsheets used to record and track financial transactions.
5. For each outstanding revenue bond issuance related to Pikeville s water and sewer operations:
  - a. Provide the bond ordinance or resolution authorizing the issuance of revenue bonds.
  - b. Provide an amortization schedule.
  - c. Provide a detailed explanation of why the debt was incurred.
6. List all persons on Pikeville s payroll during the proposed test period. For each employee, state his or her job duties, total wages paid during the fiscal year, current salary or wage rate, and the percentage of work hours spent performing duties

for each city division (e.g., water, sewer, police department, public works) during the fiscal year. If Pikeville's records do not permit the allocation of an employee's work hours among city divisions, provide an estimate for each employee and explain how Pikeville derived the estimate.

7. For each employee listed in Item 6, describe how Pikeville allocated his or her payroll and payroll overhead charges to each city division for the proposed test period. This response shall include a detailed explanation of all allocation procedures. Payroll overhead charges include payroll taxes, health insurance premiums, pension costs, and any other employee benefit costs.

8. a. List all joint or shared costs that Pikeville incurred during the proposed test period. For each cost, list the vendor, total expense amount, amounts allocated per division, and the basis for allocation.

b. Describe the procedures to allocate joint and shared costs among Pikeville's divisions for the proposed test period.

c. Provide all internal memorandums, policy statements, correspondence and documents related to the allocation of joint and shared costs.

9. Provide detailed depreciation schedules for the water and sewer divisions. A separate schedule shall be provided for each division.

10. Provide an adjusted trial balance and audit adjustments for the proposed test period and the most recently completed fiscal year. The trial balance shall be traced and referenced directly to the general ledgers requested in Item 4.

11. Provide the Enterprise Funds Uniform Financial Information Report that Pikeville submitted to the Kentucky Department of Local Government for the fiscal years

ending June 30, 1997, June 30, 1998, June 30, 1999, June 30, 2000, and June 30, 2001.

12. a. Complete the table below:

<b>Water Main Size</b>	<b>Total Miles Of Line</b>	<b>Miles Of Lines Jointly Used By Both Pikeville and Its Wholesale Customers</b>
16		
14		
12		
10		
8		
6		
4		
2		

b. Who paid for the water main(s) that Pikeville uses to deliver water to Pikeville's wholesale customers?

c. Besides Sandy Valley Water District, Mountain District, and Southern Water District, what other customers, if any, does Pikeville serve from the water mains that it uses to deliver water to these customers?

d. For each customer listed in response to Item 12(c), provide its monthly water usage for each of the previous 24 months.

13. a. What is the maximum capacity of Pikeville's water treatment plant?

b. (1) How much of Pikeville's total water treatment plant capacity is currently reserved for

(a) Sandy Valley Water District?

(b) Mountain District?

(c) Southern Water District?

(2) What changes, if any, does Pikeville expect within the next three years in the level of water treatment capacity reserved for each of the customers listed in Item 13(b)(1)? Why does Pikeville expect these changes?

14. a. Who owns the master meter(s) through which Pikeville provides water to the customers listed in Item 13(b)(1)?

b. Through how many master meters does Pikeville provide water service to each of the customers listed in Item 13(b)(1)?

c. Who is responsible for maintaining these master meters?

15. Provide a system map showing all Pikeville facilities that are used to serve the customers listed in Item 13(b)(1).

16. What portion, if any, of Pikeville's water main(s) that serve the customers listed in Item 13(b)(1) are gravity fed?

17. For each month of the previous 36 months, state Pikeville's water sales (in gallons) to:

- a. Mountain District;
- b. Sandy Valley Water District;
- c. Southern Water District; and,
- d. retail customers.



18. Complete the table below:

City of Pikeville	Gallons for Test Period	Gallons for Fiscal Year Ending June 30, 2001
Plant Use		
Line Loss (Unaccounted for)		
Sales to Retail		
Sales to Mountain Water District		
Sales to Southern Water District		
Sales to Sandy Valley Water District		
Total Produced and Purchased		
Total Sold		

19. What types of water service (e.g., service to municipal buildings, fire protection, etc.) are included in the unmetered amount? For each type of service, estimate the percentage of the total unmetered amount.

20. Provide the cost-of-service study report of April 7, 1986 that H.J. Umbaugh and Associates prepared on Pikeville's wholesale water service.

21. a. Who prepared the H.J. Umbaugh and Associates cost-of-service study?

b. Provide the preparer's curriculum vitae.

c. List all cases before the Commission in which the preparer has submitted a cost-of-service study.

d. List all utilities (municipal or public) for which the preparer has prepared a cost-of-service study. For each utility, identify the type of utility service (water or sewer) for which the report was prepared.

22. Provide a copy of the cost-of-service study upon which the proposed rates are based.