

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MORGAN)	CASE NO.
COUNTY WATER DISTRICT FOR A RATE)	2024-00010
ADJUSTMENT PURSUANT TO 807 KAR 5:076)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO MORGAN COUNTY WATER DISTRICT

Morgan County Water District (Morgan 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 June 21, 2024. The Commission directs Morgan District 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.

Morgan District shall make timely amendment to any prior response if Morgan 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 Morgan District fails or refuses to furnish all or part of the requested information, Morgan 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, Morgan 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 Morgan District's responses to Commission Staff's Second Request for Information (Staff's Second Request), Item 16.

a. Explain the significance of Morgan District providing two additional billing analyses with current and proposed rates for three employees and five employees.

b. Explain if Morgan District is proposing to use either of these rate proposals instead of what was provided in the initial application.

c. Explain how the final two years of the three-year phase-in rate proposal were calculated.

d. Explain why a three-year phase-in proposal was chosen instead of a two-year proposal given the bulk of the increase is occurring in year 1.

2. Refer to Morgan District's responses to Staff's Second Request, Item 15. Morgan District provided cost justification for a Late Payment Penalty in the amount of \$27. Of this \$27, \$2 is allocated towards materials and \$25 is towards labor.

a. Explain and provide justification for the labor involved in collecting a late payment penalty.

b. Provide justification for the \$2 in material cost for collecting a late payment penalty.

c. Morgan District's current tariff states a late payment penalty is 10 percent. Explain and provide justification as to why Morgan District is proposing to revise its late payment penalty to a flat rate of \$27. If Morgan District is proposing to change the calculation for this charge, cite to the location of customer notice of such a change in the record.



For

Linda C. Bridwell, PE
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DATED JUN 06 2024

cc: Parties of Record

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