

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Proposed Adjustment of the Wholesale)
Water Service Rates of) Case No. 2015-00039
the City of Augusta)

**CITY OF AUGUSTA'S SUPPLEMENTAL RESPONSES TO
POST-HEARING INFORMATION REQUESTS**

The City of Augusta ("City"), by counsel, hereby provides its Supplemental Responses to Post-Hearing Information Requests. Specifically, the City is providing supplemental information to Items 1 and 17 of the City's September 18, 2015, filing.

Respectfully submitted,



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COUNSEL FOR CITY OF AUGUSTA

Case No. 2015-00039
City of Augusta
Supplemental Responses to Post-Hearing Information Requests

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the City of Augusta's electronic filing of these Supplemental Responses is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Commission on September 3, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a paper copy of this Notice has been mailed to the Commission on October 2, 2015.



COUNSEL FOR CITY OF AUGUSTA

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

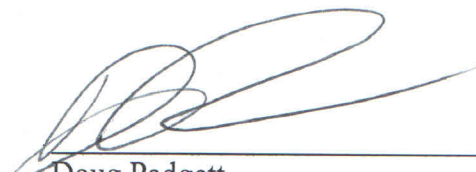
Proposed Adjustment of the Wholesale)
Water Service Rates of) Case No. 2015-00039
the City of Augusta)

**CERTIFICATION OF SUPPLEMENTAL RESPONSES TO THE
POST-HEARING INFORMATION REQUESTS**

This is to certify that I have supervised the preparation of the City of Augusta's supplemental responses to the requests for information from the hearing on September 8, 2015, and that the responses are true and accurate to the best of my knowledge, information, and belief after reasonable inquiry.

Date: _____

9/30/15



Doug Padgett
WTP Operations Manager

Case No. 2015-00039
City of Augusta
Supplemental Responses to Post-Hearing Information Requests

1. List all water testing for the Water Treatment Plant and copies of invoices for testing.

ANSWER: The invoices attached to the City's September 18, 2015, Response that are from Appalachian States Analytical, LLC, show the testing that was performed in Fiscal Year 2014.

On September 24, 2015, Bracken County Water District ("BCWD") notified the City that the City had "misinterpreted the [BCWD's] request" from the hearing. Instead of seeking water testing for the Water Treatment Plant, BCWD wanted to know which of the invoices that were provided "reflect testing performed solely for Augusta's water distribution system."

The invoices that have been produced reflect testing that is performed on behalf of the treatment plant. It is the City's position that this testing assists in determining the necessary operations of the water treatment plant. There is no testing that is performed solely for the benefit of the water distribution system.

Case No. 2015-00039
City of Augusta
Supplemental Responses to Post-Hearing Information Requests

17. Provide updated rate case expense totals and any applicable invoices to support expenses.

ANSWER: In addition to the information and records produced by the City on September 18, 2015, the following pages contain additional time entries for City Attorney Cynthia Thompson that are for time spent specifically on this rate case between July 1 and September 22, 2015.

Public Service Commission Case 2015-00039 Time Entries of City Attorney Cynthia C. Thompson

Legal Time Entry for Cynthia Thompson for City of Augusta's Rate Case
July 1 through September 22, 2015

DATE	SERVICE PERFORMED	TIME SPENT % HR	CONTRACT RATE
*****	Beginning 7/1/15 hourly rate increased to \$100.00 but continued billing case at \$75.00	*****	*****
7/6/2015	Review email from CPA Jody Franklin	0.05	\$75.00
7/7/2015	Meeting with Mayor, City Clerk, D. Padgett and Councilmember High re: WTP issues	2	\$75.00
7/10/2015	Work on counterproposal to BCWD, email to Mayor, meet w/ Mayor at School	3.5	\$75.00
7/13/2015	Meet with Mayor, D. Padgett, City Clerk at WRP Committee Members at City Hall,	↓ *****	
*****	Organize files	2	\$75.00
7/24/2015	Review several emails from Mayor & G. Wuetcher, l/d call to G. Wuetcher	0.5	\$75.00
7/27/2015	Review email notice from PSC re: Second Report on Settlement Discussions	0.1	\$75.00
7/31/2015	Review email from G. Wuetcher w/BCWD response to COA proposal	0.25	\$75.00
8/3/2015	P/c from City Clerk, check email, review emails from City Clerk	0.25	\$75.00
8/4/2015	Review emails from D. Spenard G. Wuetcher and D. Padgett, respond to D. Spenard	0.25	\$75.00
8/4/2015	Meet w/Mayor, City Clerk, D. Padgett, and Councilmembers High & Taylor re: WTP	2	\$75.00
8/5/2015	P/c form G. Wuetcher, review email from same, email from Mayor & City Clerk	0.85	\$75.00
8/6/2015	Conference call w/PSC (City Clerk present), discuss case w/ City Clerk,	1.25	\$75.00
8/6/2015	Review Notice of Informal Conference rec'd via email, review email from	↓ *****	
*****	G. Wuetcher about settlement meeting	0.1	\$75.00
8/7/2015	Work on Personnel Positions for WTP	2	\$75.00
8/10/2015	Review 2 emails from Mayor re: meeting w/BCWD & respond	0.1	\$75.00
8/10/2015	Meet w/City Clerk & D. Padgett at City Office re: PSC case	1.25	\$75.00
8/11/2015	Meet w/City Clerk & D. Padgett at City Office re: PSC case, prepare for meeting	3.6	\$75.00
8/11/2015	Attend Special Call meeting approving hiring of D. Padgett as WTP Operations Mgr,	↓ *****	
*****	meet w/Mayor afterward,	1	\$75.00
8/12/2015	Prep Memo re: WTP, email from Mayor & City Clerk, 2 p/cs w/ City Office	1	\$75.00
8/12/2015	Organize PSC/WTP files, Meeting at City Office w/ Mayor, City Clerk, D. Padgett	↓	\$75.00
*****	& BCWD Officials, meet afterwards w/Mayor	3.5	\$75.00
8/14/2015	Review PSC Order & Memo rec'd via email, p/c to City Office, email Mayor,	↓ *****	
*****	City Clerk	0.5	\$75.00
8/18/2015	Review email from G. Wuetcher	0.1	\$75.00
8/19/2015	Conference call w/ D. Spenard & G. Wuetcher, review proposed Motion to Modify	↓ *****	

Public Service Commission Case 2015-00039 Time Entries of City Attorney Cynthia C. Thompson

*****	Procedural Schedule via email & respond	0.5	\$75.00
8/20/2015	P/c from G. Wuetcher, review email from same re: Settlement Proposal, & respond,	↓ *****	
*****	review Notice of Filing from PSC,	0.15	\$75.00
8/21/2015	Review emails from Mayor, respond, review email from City Clerk, p/c to City Clerk,	↓	
*****	review email from G. Wuetcher	0.25	\$75.00
8/24/2015	Review email from D. Padgett about case; meet w/ City Clerk and D. Padgett at	↓ *****	
*****	City Office to work on PSC case, /c to Charlie Cole, p/c to D. Spenard, get PSC emails	↓	
*****	& respond, meet w/ City Clerk & Mayor,	7.5	\$75.00
8/25/2015	Conference call w/ T. Osterloh & D. Padgett, review PSC related emails and respond	1.25	\$75.00
8/25/2015	P/c from G. Wuetcher, email D. Spenard, forward G. Wuetcher email to Mayor, City	↓ *****	
*****	Clerk & D. Padgett, Receive emails from T. Osterloh & G. Wuetcher & respond,	↓ *****	
*****	meet w/ Mayor, City Clerk & D. Padgett at City office	2.8	\$75.00
8/26/2015	Receive 3 emails from T. Osterloh, p/c from T. Osterloh, p/c to City Clerk	0.5	\$75.00
8/26/2015	Meet w/ City Clerk & D. Padgett at City office, receive emails from T. Osterloh re:	↓ *****	
*****	Motion to Amend Tariff, work on PSC case	4	\$75.00
8/26/2015	Review emails from D. Spenard, emails from T. Osterloh, review PSC filing via email	0.5	\$75.00
8/27/2015	Emails from T. Osterloh, & Chris Stewart of HMB re: Cost of Service Study	0.1	\$75.00
8/27/2015	P/c from T. Osterloh, work on PSC case at City Office, review PSC filings via email	4.5	\$75.00
8/28/2015	Review emails from City Clerk, T. Osterloh, & PSC filings, p/c from City Clerk	0.25	\$75.00
8/31/2015	Conference call w/T. Osterloh at City Office, meet w/ City Clerk & D. Padgett	2.75	\$75.00
8/31/2015	Work on PSC case at City Office (THIS TIME NOT BILLED TO CITY)	2	\$75.00
9/1/2015	Email Elwood Howell of Rural Development w/Bond questions, review response,	↓ *****	
*****	p/c to City Clerk, l/d p/c to E. Howell, left message, p/c to T. Osterloh, meet w/ City	↓ *****	
*****	Clerk & D. Padgett, Receive emails from City Clerk, T. Osterloh & D. Padgett, &	↓ *****	
*****	respond, email from D. Spenard, review PSC filing	4	\$75.00
9/2/2015	Attend PSC Informal Conference in Frankfort; review PSC filing by G. Wuetcher	9	\$75.00
9/3/2015	P/c to City Clerk, review PSC related emails & respond, p/c to T. Osterloh	1.25	\$75.00
9/4/2015	Review PSC Order, review PSC related emails and respond, l/d p/c to T. Osterloh	1.25	\$75.00
9/5/2015	Review and respond to email from T. Osterloh	0.05	\$75.00
9/7/2015	Organize files, review PSC related email, prepare for hearing	4	\$75.00
9/8/2015	Attend Hearing at PSC	12.5	\$75.00
9/10/2015	Review post-hearing emails from T. Osterloh, City Clerk & D. Padgett, respond	0.5	\$75.00
9/11/2015	Review PSC Order	0.25	\$75.00
9/14/2015	Review PSC filing- BCWD Motion to Redact	0.1	\$75.00

Public Service Commission Case 2015-00039 Time Entries of City Attorney Cynthia C. Thompson

9/16/2015 Review PSC Order & filing- BCWD Motion to Incorporate	1	\$75.00
9/17/2015 Review post-hearing emails, l/d p/c to T. Osterloh, review PSC Order	0.75	\$75.00
9/18/2015 Review PSC filing-Notice of Compliance & exhibits, respond to T. Osterloh email	1	\$75.00
9/22/2015 Review PSC Order, email T. Osterloh	0.1	\$75.00
Total from July 1 to September 22, 2015	88.95	\$ 6,671.25
Total from January 1 to September 22, 2015	209.35	\$15,701.25