CASE NO. 2015-00382
WATER SERVICE CORPORATION OF KENTUCKY
RESPONSES TO THE ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION

1. Reference: Attachment to Staff DR 1.1. The customer data use the following codes in the "RS_CD" column:

    a. 345CHYMN
    b. 345CHYPV
    c. 345CSPPV
    d. 345CWCOM
    e. 345CWMLT
    f. 345CWRES
    g. 345GHYD
    h. 345HYD
    i. 345IHYD
    j. 345MWCOM
    k. 345MWGOV
    l. 345MWIN2
    m. 345MWIND
    n. 345MWRES
    o. 345SPRN

    Please state what "RS_CD" stands for and for each code, please describe the classification in words (for example, Residential in Middlesboro)

    Response: "RS_CD" stands for Rate Schedule

    a. 345CHYMN – Municipal Hydrant in Clinton
    b. 345CHYPV – Private Hydrant in Clinton
    c. 345CSPPV – Sprinkler Protection (Private) in Clinton
    d. 345CWCOM – Commercial in Clinton
    e. 345CWMLT – Multi-Residential in Clinton
    f. 345CWRES – Residential in Clinton
    g. 345GHYD – Government Hydrant in Middlesboro
    h. 345HYD – Hydrant in Middlesboro
    i. 345IHYD – Industrial Hydrant in Middlesboro
    j. 345MWCOM – Commercial in Middlesboro
    k. 345MWGOV – Governmental in Middlesboro
    l. 345MWIN2 – Industrial with 2 meters in Middlesboro
    m. 345MWIND – Industrial in Middlesboro
    n. 345MWRES – Residential in Middlesboro
    o. 345SPRN – Sprinkler Protection in Middlesboro

    Witness: Brian Halloran

2. Reference: Attachment to Staff DR 1.1. The customer data use the following codes in the "DST_ID" column:

    a. FRP PUB
    b. WTR COM
    c. WTR IND
    d. WTR MFD
    e. WTR PA
    f. WTR RES

    Please state what "DST_ID" stands for and for each code, please describe the classification in words (for example, Residential Water customer).

    Response: "DST_ID" stands for Distribution Code

    a. FRP PUB - Fire Protection Public
    b. WTR COM – Commercial Water Customer
    c. WTR IND - Industrial Water Customer
    d. WTR MFD – Multi-Family Dwelling Customer
    e. WTR PA Public Authority
    f. WTR RES – Residential Water Customer

    Witness: Brian Halloran

3. Please confirm that neither existing nor proposed rates differ by customer class (Residential, Commercial, etc.). If this is not confirmed, please state in detail how rates differ by customer class and provide tariff sheets showing the differences.

   Response: Confirmed. Neither existing nor proposed rates differ by customer class.

   Witness: Brian Halloran

4. Reference: Notice of Proposed Increase for Middlesboro. Please describe with specificity how the "Avg. Usage" column was calculated for each meter size. If the data provided in response to Staff DR 1.1 and/or the data in Schedule D were used in the calculation, please state specifically which column(s) and/or row(s) of data were used in the calculation. If the data provided in response to Staff DR 1.1 and Schedule D were not used in the calculation, please provide the data that were used in an electronic format readily useable in Microsoft Excel.

   Response: The "Avg. Usage" column on the Notice of Proposed Increase for Middlesboro was calculated using the consumption data found in Schedule D, which incorporates the Company's proposed usage normalization adjustment. The Company used the total amount of Actual Gallons Consumed by meter size for all customer classes, found in Column B of Schedule D, divided by the total number of bills by meter size for all customer classes, found in Column C of Schedule D, in order to calculate the "Avg. Usage" for each meter size.

   For example, Middlesboro 5/8" and 3/4" meter customers had the following totals for Actual Gallons Consumed and total number of bills:

Response to AG DR 1.04
Middlesboro 5/8" and 3/4" Meter

A	B	C	D
Class	**Meter Size**	**Total Gallonage**	**# of Bills**
Residential	5/8"	224,676,367	59,288
Commercial	5/8"	26,729,582	6,405
Governmental	5/8"	1,987,599	156
Industrial	5/8"	691,550	95
Commercial	3/4"	11,835	24
		254,096,932	65,968

Avg. Usage (Total C / Total D)	3,852

Witness: Brian Halloran

5. Reference: Notice of Proposed Increase for Middlesboro. Why is the Company proposing an average bill increase of less than 1% for customers with 4-inch meters when all other meter sizes have average increases ranging from 22.48% to 32.38%? Please provide any studies, analyses, memoranda, or other documents specifically discussing the effects of the proposed rate design on customers with 4-inch meters.

   Response: The Company recognizes not all customers have a similar proposed increase to their average bills. This is the result of using a cost of service study, which allows the customer to be billed rates which are consistent with the cost to serve said customer. Customers with 4" meters receive an equivalency factor for their meter of 25 (5/8" = 1), which is the meter equivalency factor utilized by the American Water Works Association, *Principles of Water Rates, Fees and Charges*. It can be inferred that because the proposed increase for 4" customers is much less than the proposed increase for other customers, that 4" customers have historically subsidized other customers.

   Witness: Brian Halloran

6. Reference: Notice of Proposed Increase for Clinton. Please describe with specificity how the "Avg. Usage" column was calculated for each meter size. If the data provided in response to Staff DR 1.1 were used in the calculation, please state specifically which column(s) of data were used in the calculation. If the data provided in response to Staff DR 1.1 were not used in the calculation, please provide the data that were used in an electronic format readily useable in Microsoft Excel.

Response: Please refer to the response provided in Item 4 above. The "Avg. Usage" column calculated for each meter size in the notice of proposed increase for Clinton is the same calculation, which relied on using Column B and Column C of Schedule D, except using the Clinton customer data.

Witness: Brian Halloran

7. Reference: Schedule D (Revised). Please describe with specificity how the billing units in Schedule D are derived from the attachment to Staff DR 1.1.

Response: The amount of gallons by meter size found in Schedule D (Revised) are found in "Table II: Test Year Consumption" in the attachment provided in response to Item 1 of the Commission's First Request for Information. Although this table only shows usage by rate schedule, the tab labeled *"Detailed Billing Pivot v2"* in the attachment provided in response to Staff DR 1.3 labeled *"Staff DR 1.3 – wp s Revenue"* shows "Table II: Test Year Consumption" by meter size.

The file labeled *"Staff DR 1.3 – wp s Revenue",* was used to generate the number of bills found in Schedule D (Revised) as well. The number of bills was calculated from the tab labeled *"Detailed Billing Pivot v2"*, by counting the number of rows per meter size and rate schedule.

Witness: Brian Halloran

8. Reference: w/p [t-1]. It appears that in calculating present customer charge revenues on this workpaper, all bills for Middlesboro and Clinton were priced at the present rates for Middlesboro. Please review this workpaper for accuracy and provide a corrected version of this page and any other pages of the COSS workpapers that change as a result (in both PDF and a revised Excel file, replacing the file provided in response to Staff DR 1.3).

   Response: This workpaper is calculating correctly. The present rates shown in column C of w/p [t-1] are blended rates, and only appear to be similar to Middlesboro rates. Current rates are calculated by using total base revenues by meter size for all customer classes in both systems and divided by the total number of bills by meter size for all customer classes in both systems.

   Witness: Brian Halloran

9. Reference: w/p [t-3]. What is the basis for allocating Intangible Plant 40% fixed and 60% variable? Please provide references to any ratemaking manuals or treatises that the Company considers to be authoritative that support the allocation of intangible plant in this manner.

Response: The source of the 40/60 split is from UI's most recent Illinois Rate Case filed with the ICC (Docket No. 14-0741) which was approved by the ICC on 10/02/2015. The 40/60 split used in Docket No. 14-0741 comes from the guidelines established by the Florida PSC. The guidelines from the Florida PSC can be found on page 9 of the attached file labeled *"AG DR 1.9 – Florida PSC Water Ratemaking Toolbox"*. The Company's analysis shows the current rate structure for WSCK yields a 44/56 split for customers. Given the similarity between the ratios used in Florida, what was approved in Illinois, and the current split for WSCK customers, the Company utilized the 40/60 split as it is slightly more beneficial to its customer base than using the current, 44/56 split. For support of the 44/56 split, please refer to the tab "Structure" on the attached workbook labeled *"AG DR 1.9 – WSCK Rate Structure"*. On this tab, cells D4 and D5 show the fixed and variable split, respectively, for all of WSCK. On the same tab, cells D9 and D10 show the fixed and variable split, respectively, for Middlesboro only, while cells D14 and D15 show the fixed and variable split, respectively, for Clinton only.

Witness: Brian Halloran

AG DR 1.9

Florida PSC Water Ratemaking Toolbox

FLORIDA
PUBLIC
SERVICE
COMMISSION

The Florida PSC's Water Ratemaking Toolbox

Jennie Lingo

Economic Analyst

Florida Public Service Commission

NARUC 2015 Summer Meetings

JULY 14, 2015

OUTLINE

I. Florida PSC Revenue Requirements Toolbox

A. Annual Rate Adjustment Tools

1) Price Index Rate Adjustments

2) Pass Through Rate Adjustments

B. Rate Case Tools

1) Limited Proceedings

2) Interim Rates

3) Projected Test Year

4) Staff-Assisted Rate Cases

II. Florida PSC Rate Design Toolbox

A. Fixed Cost vs. Variable Cost Allocations

B. Conservation Rate Structures

C. Price Elasticity Adjustment

III. Florida PSC Reuse Toolbox

A. Revenue Requirement Allocations

B. Rate Design

Annual Rate Adjustment Tools

Price Index Rate Adjustments

Ch 367.081 (4)(a), F.S.

- By March 31 of each year, the FPSC establishes a price increase or decrease for major categories of operating costs incurred by water and wastewater utilities *(In place since 1981)*

- Applicable to most O&M expenses
- Purpose is to mitigate inflationary pressures on the utility
- Increased rates become effective 60 days after official receipt of utility's application

Annual Rate Adjustment Tools

Pass Through Rate Adjustments Ch 367.081 (4)(b), (c), F.S.

- Increased rates become effective 45 days after official receipt of utility's application
- Allowed pass through items include:
  - ✓ purchased power
  - ✓ purchased water
  - ✓ ad valorem taxes
  - ✓ purchased wastewater treatment
  - ✓ new DEP required water testing
  - ✓ new DEP required wastewater testing
  - ✓ National Pollutant Discharge Elimination System fees

Rate Case Tools

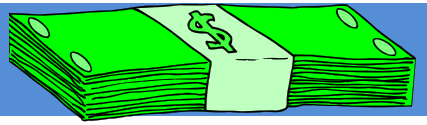
Limited Proceedings (LIMPs) Ch 367.0822, F.S.

- Case is limited in scope
- Proceeding can be initiated by either the utility or the FPSC
- FPSC determines the issues to be considered
- If ROR not an issue specifically addressed in the LIMP, the FPSC shall not adjust rates if it would result in a change to the last authorized ROR

Rate Case Tools

Interim Rates

Ch 367.082, F.S.



- During any proceeding for a change in rates, the FPSC may authorize the collection of interim rates until the effective date of the final order in that proceeding
- The FPSC authorizes interim relief within 60 days of the utility's interim filing
- The difference between the interim rates and the previously authorized rates are collected under bond, escrow, letter of credit, or corporate undertaking, subject to refund with interest

Rate Case Tools

Projected Test Year

Ch 367.081 (2) (a) (2), F.S.

- Utility may request a projected test year

  (the projected test year may be either 1 or 2 years after the end of the historic base year)

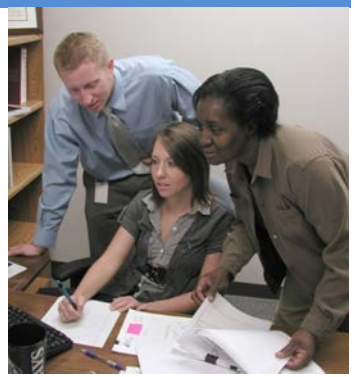
- Projections are analyzed and must be reasonable

- Growth projection methodology, as well as the projected values for ERCs, bills and consumption, are evaluated and are issues addressed in staff's recommendation

- Results may more closely match financial position of the utility when the rates go into effect

Rate Case Tools

Staff Assisted Rate Cases Ch 367.0814, F.S.



- Annual revenues of $300,000 or less
- FPSC staff performs all work in the case *(engineering, accounting, financial, legal)*
- The only required expense of the utility is its filing fee
- The utility may hire consultants and/or attorneys to assist with case
- Utility agrees to accept FPSC vote, unless:
  1. FPSC votes a revenue requirement decrease
  2. There is a protest of the resulting FPSC Order

Rate Design Tools

Fixed Cost (FC) vs. Variable Cost (VC) Allocations

- In order to price for conservation, the FPSC typically approves FC allocation percentages of 30% - 40%

- Considerations:

  1. Need to send stronger conservation signals
  2. Seasonality of customer base (typically, the greater the seasonality, the greater the BFC allocation)
  3. Customer affordability concerns

Rate Design Tools

Fixed Cost (FC) vs. Variable Cost (VC) Allocations

Assume: Potential cash flow concerns for the utility

+

A **greater** BFC (fixed) charge

A **lesser** gallonage (variable) charge

↓

Is beneficial to **utilities**

↓

More of the bill is fixed, resulting in ***greater cash flow certainty***

(therefore the utility should be better able to pay its bills)

Rate Design Tools

Fixed Cost (FC) vs. Variable Cost (VC) Allocations

Assume: Potential customer affordability concerns

A **lesser** BFC (fixed) charge

\+

A **greater** gallonage (variable) charge

↓

Is beneficial to **customers**

↓

Less of the bill is fixed, resulting in ***greater control for the customer over their total water bill***

(plus the benefit of greater water conservation)

Rate Design Tools

Conservation Rate Structures

Inclining Block Rate Structures

1. Usually 2 or 3 tiers
2. Although it is more difficult to design than the uniform volumetric rate, it is fairly easy for customers to understand
3. Without definition of customer classes, it can penalize large users

Seasonal Rate Structures

1. Peak season / off-peak season rates
2. Revenue is concentrated in peak months
3. Need adequate operating funds

(especially during off-peak months)

Rate Design Tools

Price Elasticity Adjustment

- In a rate case order involving Lake Utility Services, Inc., the FPSC stated:

  "If the anticipated consumption reductions (loss of demand) are not considered in the ratesetting process, price increases will, all other things being equal, result in under-earnings for the utility, jeopardizing the utility's financial health."

  Order No. PSC-11-0514-PAA-WS, issued November 3, 2011, in Docket No. 100426-WS, In re: Application for increase in water and wastewater rates in Lake County by Lake Utility Services, Inc.

Rate Design Tools

Price Elasticity Adjustment

- Recognizes that as the price of water increases, there will be a reduction in ***discretionary*** consumption

- Adjustment is applied to ***residential*** consumption only

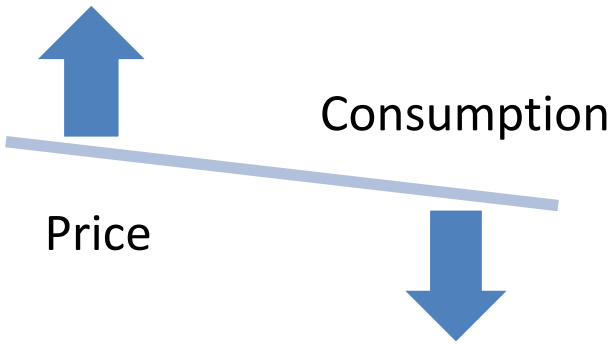
  - ✓ **No adjustment** is made to the **essential, non-discretionary** portion of residential consumption

  - ✓ Non-discretionary residential consumption in Florida is approximately 50 gallons / person / day

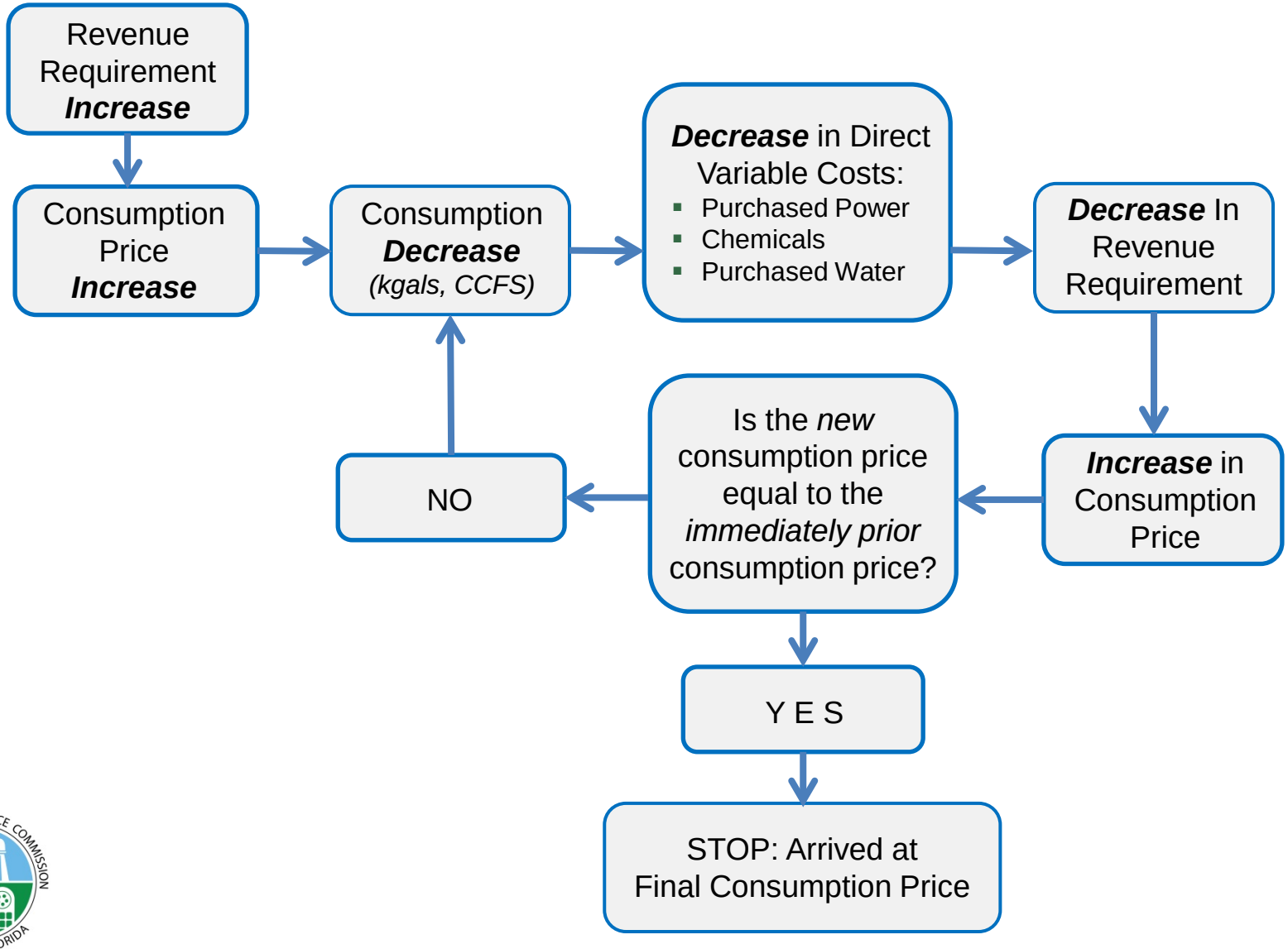
Rate Design Tools

Price Elasticity Adjustment

- The anticipated consumption reduction is reflected in the calculation of
  - ✓ the gallonage charges
  - ✓ the utility's direct variable expenses associated with water production
- FPSC first began making adjustments in 2000



Price Elasticity Adjustment



REUSE

Brief Definition Ch 367.0817, F.S.

Reuse uses wastewater or reclaimed water ***from*** one application ***for*** another application

Issues:

- Our potable water supplies of low cost water are rapidly shrinking
- High infrastructure costs
- Cost recovery and appropriate pricing

Reuse

Revenue Requirement Allocations

- The Florida PSC has the discretion to allocate reuse costs to either the wastewater system, the water system, or a combination of the two
- In Florida, we typically allocate some percentage of reuse to both the wastewater and water systems
- Florida PSC staff calculates the revenue requirements for the wastewater, water and reuse systems under different reuse cost allocation scenarios

Reuse

Rate Design

- Should ***not*** price reuse such that it either:
  - ✓ discourages its use
  - ✓ negatively impacts a utility's ability to dispose of its reuse
- ***Should*** make reuse the ***lowest cost option*** for residential and general service irrigation
  - ✓ Recalculate water rates taking into account estimated ***reduction*** in units of ***water*** sold ***(potable water replaced by reuse)***
  - ✓ Result is a slight ***increase*** in water gallonage charges
  - ✓ Estimate the number of ***reuse*** gallons that will be used ***(reuse "take" rate)***

Thank you for your attention!

Questions?
Please call or email me:

Jennie Lingo
Florida Public Service Commission
Phone: (850) 413-6964

Email to: jlingo@psc.state.fl.us

http://www.floridapsc.com/

AG DR 1.9

WSCK Rate Structure

(see attached Excel file)

10. Reference: w/p [t-3]. What is the basis for allocating Source of Supply plant 40% fixed and 60% variable? Please provide references to any ratemaking manuals or treatises that the Company considers to be authoritative that support the allocation of source of supply plant in this manner.

    Response: Please see the response to Item 9 above.

    Witness: Brian Halloran

11. Reference: w/p [t-3]. What is the basis for allocating Pumping Plant 40% fixed and 60% variable? Please provide references to any ratemaking manuals or treatises that the Company considers to be authoritative that support the allocation of pumping plant in this manner.

    Response: Please see the response to Item 9 above.

    Witness: Brian Halloran

12. Reference: w/p [t-3]. What is the basis for allocating Water Treatment Plant 40% fixed and 60% variable? Please provide references to any ratemaking manuals or treatises that the Company considers to be authoritative that support the allocation of water treatment plant in this manner.

    Response: Please see the response to Item 9 above.

    Witness: Brian Halloran

13. Reference: w/p [t-3]. What is the basis for allocating Mains 40% fixed and 60% variable? Please provide references to any ratemaking manuals or treatises that the Company considers to be authoritative that support the allocation of mains in this manner.

    Response: Please see the response to Item 9 above.

    Witness: Brian Halloran

14. Reference: w/p [t-3]. What is the basis for allocating Hydrants 40% fixed and 60% variable? Please provide references to any ratemaking manuals or treatises that the Company considers to be authoritative that support the allocation of hydrants in this manner.

    Response: Please see the response to Item 9 above.

    Witness: Brian Halloran

15. Reference: w/p [t-3]. What is the basis for allocating Storage plant 40% fixed and 60% variable? Please provide references to any ratemaking manuals or treatises that the Company considers to be authoritative that support the allocation of storage plant in this manner.

Response: Please see the response to Item 9 above.

Witness: Brian Halloran

16. Reference: w/p [t-3]. What is the source of the 40% fixed and 60% variable figures used in this workpaper?

    Response: Please see the response to Item 9 above.

    Witness: Brian Halloran

17. Reference: w/p [t-4]. What is the basis for allocating Pumping Expenses 40% fixed and 60% variable? Please provide references to any ratemaking manuals or treatises that the Company considers to be authoritative that support the allocation of pumping expenses in this manner.

    Response: Please see the response to Item 9 above.

    Witness: Brian Halloran

18. Reference: w/p [t-4]. What is the basis for allocating Water Treatment Expenses 40% fixed and 60% variable? Please provide references to any ratemaking manuals or treatises that the Company considers to be authoritative that support the allocation of treatment expenses in this manner.

    Response: Please see the response to Item 9 above.

    Witness: Brian Halloran

19. Reference: w/p [t-4]. What is the basis for allocating Mains Expenses 40% fixed and 60% variable? Please provide references to any ratemaking manuals or treatises that the Company considers to be authoritative that support the allocation of mains expenses in this manner.

    Response: Please see the response to Item 9 above.

    Witness: Brian Halloran

20. Reference: w/p [t-4]. What is the source of the 40% fixed and 60% variable figures used in this workpaper?

    Response: Please see the response to Item 9 above.

    Witness: Brian Halloran

21. Reference: w/p [t-5]. There appears to be an error in the formulas calculating Equivalent Services. Please confirm that the number of Equivalent Meters and Equivalent Services should be the same for each customer class, and provide a corrected version of this page and any other pages of the COSS workpapers that change as a result (in both PDF and a revised Excel file, replacing the file provided in response to Staff DR 1.3).

Response: The tab "wp t-5 COSS" appears to have been calculating incorrectly. The Company has corrected the calculation. Please reference the files labeled *"AG 1.21 – COSS Workpapers"* for the corrected COSS workpaper that changed as a result of the correction.

Witness: Brian Halloran

AG 1.21

COSS Workpapers

WATER SERVICE CORPORATION OF KENTUCKY **w/p [t-5]**
Case No. 2015 - 00382
Cost of Service Study
"Equivalent Meters and Services"
Test Year Ended 6/30/2015

	A	B	C	D	E		F	G	H	I
LINE	ITEM	METER	SERVICE	RESIDENTIAL	COMMERCIAL		GOVERNMENTAL	INDUSTRIAL	MULTI RESIDENTIAL	TOTAL
1	METER SIZE									
2	5/8"	1.0	1.0	59,513	6,451		180	95	0	66,239
3	3/4"	1.0	1.0	5,588	687		108	0	0	6,383
4	1"	2.5	2.5	288	836		84	12	84	1,304
5	1.5"	5.0	5.0	0	226		95	24	0	345
6	2"	8.0	8.0	0	370		228	35	12	645
7	3"	15.0	15.0	0	36		48	12	0	96
8	4"	25.0	25.0	0	12		12	12	0	36
9	6"	50.0	50.0	0	24		0	12	0	36
10										
11										
12	Equivalent Meters			65,821	15,358		3,817	1,605	306	86,907
13										
14	Equivalent Services			65,821	14,158		3,817	1,005	306	86,907

22. Reference: w/p [t-5]. Do any customers share a service line with one or more other customers? If so, please provide a corrected calculation of the number of services for each customer class on this workpaper.

Response: No customers are sharing a service line. If any are found, we separate the service lines and do not charge any additional minimums to the customer that has an account in water service.

Witness: Brian Halloran

23. Reference: Direct Testimony of Brian N. Halloran, p. 15, lines 6-12. Did the Company perform any analysis to determine the cost of service separately for the Middlesboro and Clinton service areas? If so, please provide all such analyses. If not, why not?

Response: Please refer to the attached file labeled *"AG DR 1.23 – Revenue Requirement by System"*. On the tab labeled *"Revenue Requirement"* of the above referenced file, the analysis shows the cost to serve Middlesboro customers is approximately 18% lower than Clinton customers. However, on the tab labeled *"Cost Per Gallon"* on the excel file labeled *"AG DR 1.9 – WSCK Rate Structure"* provided in response to AG DR 1.9, the analysis shows that Clinton customers currently pay approximately 72% more for a gallon of water than Middlesboro customers. Given this imbalance, the Company believes it is appropriate to perform a cost of service study for combined systems.

Witness: Brian Halloran

AG DR 1.23

Revenue Requirement by System

(see attached Excel file)

24. Reference: Direct Testimony of Brian N. Halloran, p. 16, line 8 through p. 17 line 2. Did the Company perform any analysis to determine if there was a cost justification for having tiered consumption rates? If so, please provide all such analyses. If not, why not?

Response: The Company has been billing its customers under the tiered consumption rate design since acquisition. The Company does not possess documentation as to why or how the rate design was originally established, but has speculated the original design was based on a customer base no longer recognized by the Company. The Company has analyzed consumption by customer class/tier, please refer to the attached document labeled *"AG DR 1.24"*. Columns I, J and K assisted the Company with its analysis. The Company believes the data shows there are many instances where the higher ranked tiers are not utilized and the overwhelming majority of the billings occur within the first tier. Therefore, the Company believes a single tier rate structure is more appropriate for its current customer mix.

Witness: Brian Halloran

CASE NO. 2015-00382
WATER SERVICE CORPORATION OF KENTUCKY
RESPONSES TO THE ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION

AG DR 1.24

AG DR 1.24

	A	B	C	D	E	F	G	H	I	J	K
Line No	Rate Schedule	Bill Factor	Meter Size	Gallons		Actual Gallons Consumed (000's)	# of Bills	Billable Gallons (000's)	Volume of Bills	Weight of Max Consumption	Rolling Weight of Consumption
1											
2					**MIDDLESBORO**						
3											
4	345MWRES		5/8"		Residential 5/8" Meter	228,277					
5	345MWRES	345MWUT1	5/8"	1,000	First 1,000		59,288		9,231	15.57%	15.57%
6	345MWRES	345MWUT2	5/8"	10,000	Next 9,000			155,386	47,497	80.11%	95.68%
7	345MWRES	345MWUT3	5/8"	25,000	Next 15,000			12,798	2,288	3.86%	99.54%
8	345MWRES	345MWUT4	5/8"	50,000	Next 25,000			2,987	223	0.38%	99.92%
9	345MWRES	345MWUT5	5/8"	100,000	Next 50,000			1,601	26	0.04%	99.96%
10	345MWRES	345MWUT6	5/8"	100,001	Over 100,000			1,598	23	0.04%	100.00%
11					**Total Residential 5/8" Meter**	**228,277**	**59,288**	**174,369**			
12											
13											
14	345MWCOM		5/8"		Commercial 5/8" Meter	27,102					
15	345MWCOM	345MWUT1	5/8"	1,000	First 1,000		6,405		2,675	41.76%	41.76%
16	345MWCOM	345MWUT2	5/8"	10,000	Next 9,000			12,842	3,201	49.98%	91.74%
17	345MWCOM	345MWUT3	5/8"	25,000	Next 15,000			4,172	376	5.87%	97.61%
18	345MWCOM	345MWUT4	5/8"	50,000	Next 25,000			2,577	82	1.28%	98.89%
19	345MWCOM	345MWUT5	5/8"	100,000	Next 50,000			1,964	54	0.84%	99.73%
20	345MWCOM	345MWUT6	5/8"	100,001	Over 100,000			967	17	0.27%	100.00%
21					**Total Commercial 5/8" Meter**	**27,102**	**6,405**	**22,522**			
22											
23											
24	345MWGOV		5/8"		Governmental 5/8" Meter	1,993					
25	345MWGOV	345MWUT1	5/8"	1,000	First 1,000		156		76	48.72%	48.72%
26	345MWGOV	345MWUT2	5/8"	10,000	Next 9,000			370	56	35.90%	84.62%
27	345MWGOV	345MWUT3	5/8"	25,000	Next 15,000			298	5	3.21%	87.82%
28	345MWGOV	345MWUT4	5/8"	50,000	Next 25,000			379	7	4.49%	92.31%
29	345MWGOV	345MWUT5	5/8"	100,000	Next 50,000			579	3	1.92%	94.23%
30	345MWGOV	345MWUT6	5/8"	100,001	Over 100,000			260	9	5.77%	100.00%
31					**Total Governmental 5/8" Meter**	**1,993**	**156**	**1,886**			
32											
33											
34	345MWIND		5/8"		Industrial 5/8" Meter	655					
35	345MWIND	345MWUT1	5/8"	1,000	First 1,000		95		15	15.79%	15.79%
36	345MWIND	345MWUT2	5/8"	10,000	Next 9,000			301	61	64.21%	80.00%
37	345MWIND	345MWUT3	5/8"	25,000	Next 15,000			221	15	15.79%	95.79%
38	345MWIND	345MWUT4	5/8"	50,000	Next 25,000			39	3	3.16%	98.95%
39	345MWIND	345MWUT5	5/8"	100,000	Next 50,000			13	1	1.05%	100.00%
40	345MWIND	345MWUT6	5/8"	100,001	Over 100,000			-	-	0.00%	100.00%
41					**Total Industrial 5/8" Meter**	**655**	**95**	**574**			
42											
43											
44	345MWCOM		3/4"		Commercial 3/4" Meter	12					
45	345MWCOM	345MWUT1	3/4"	1,000	First 1,000		24		24	100.00%	100.00%
46	345MWCOM	345MWUT2	3/4"	10,000	Next 9,000			-	-	0.00%	100.00%
47	345MWCOM	345MWUT3	3/4"	25,000	Next 15,000			-	-	0.00%	100.00%
48	345MWCOM	345MWUT4	3/4"	50,000	Next 25,000			-	-	0.00%	100.00%
49	345MWCOM	345MWUT5	3/4"	100,000	Next 50,000			-	-	0.00%	100.00%
50	345MWCOM	345MWUT6	3/4"	100,001	Over 100,000			-	-	0.00%	100.00%
51					**Total Commercial 3/4" Meter**	**12**	**24**	**0**			

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	A	B	C	D	E	F	G	H	I	J	K
Line No	Rate Schedule	Bill Factor	Meter Size	Gallons		Actual Gallons Consumed (000's)	# of Bills	Billable Gallons (000's)	Volume of Bills	Weight of Max Consumption	Rolling Weight of Consumption
52											
53											
54	345MWCOM		1"		Commercial 1" Meter	12,347					
55	345MWCOM	345MWUT1	1"	6,000	First 6,000		800		362	45.25%	45.25%
56	345MWCOM	345MWUT2	1"	10,000	Next 4,000			1,504	116	14.50%	59.75%
57	345MWCOM	345MWUT3	1"	25,000	Next 15,000			3,487	144	18.00%	77.75%
58	345MWCOM	345MWUT4	1"	50,000	Next 25,000			2,489	134	16.75%	94.50%
59	345MWCOM	345MWUT5	1"	100,000	Next 50,000			1,089	38	4.75%	99.25%
60	345MWCOM	345MWUT6	1"	100,001	Over 100,000			144	6	0.75%	100.00%
61					**Total Commercial 1" Meter**	**12,347**	**800**	**8,713**			
62											
63											
64	345MWRES		1"		Residential 1" Meter	1,795					
65	345MWRES	345MWUT1	1"	6,000	First 6,000		288		169	58.68%	58.68%
66	345MWRES	345MWUT2	1"	10,000	Next 4,000			293	81	28.13%	86.81%
67	345MWRES	345MWUT3	1"	25,000	Next 15,000			173	34	11.81%	98.61%
68	345MWRES	345MWUT4	1"	50,000	Next 25,000			43	4	1.39%	100.00%
69	345MWRES	345MWUT5	1"	100,000	Next 50,000			-	-	0.00%	100.00%
70	345MWRES	345MWUT6	1"	100,001	Over 100,000			-	-	0.00%	100.00%
71					**Total Residential 1" Meter**	**1,795**	**288**	**509**			
72											
73											
74	345MWGOV		1"		Governmental 1" Meter	565					
75	345MWGOV	345MWUT1	1"	6,000	First 6,000		36		11	30.56%	30.56%
76	345MWGOV	345MWUT2	1"	10,000	Next 4,000			95	2	5.56%	36.11%
77	345MWGOV	345MWUT3	1"	25,000	Next 15,000			184	15	41.67%	77.78%
78	345MWGOV	345MWUT4	1"	50,000	Next 25,000			82	6	16.67%	94.44%
79	345MWGOV	345MWUT5	1"	100,000	Next 50,000			14	2	5.56%	100.00%
80	345MWGOV	345MWUT6	1"	100,001	Over 100,000			-	-	0.00%	100.00%
81					**Total Governmental 1" Meter**	**565**	**36**	**375**			
82											
83											
84	345MWIND		1"		Industrial 1" Meter	145					
85	345MWIND	345MWUT1	1"	6,000	First 6,000		12		-	0.00%	0.00%
86	345MWIND	345MWUT2	1"	10,000	Next 4,000			48	1	8.33%	8.33%
87	345MWIND	345MWUT3	1"	25,000	Next 15,000			25	11	91.67%	100.00%
88	345MWIND	345MWUT4	1"	50,000	Next 25,000			-	-	0.00%	100.00%
89	345MWIND	345MWUT5	1"	100,000	Next 50,000			-	-	0.00%	100.00%
90	345MWIND	345MWUT6	1"	100,001	Over 100,000			-	-	0.00%	100.00%
91					**Total Industrial 1" Meter**	**145**	**12**	**73**			
92											

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	A	B	C	D	E	F	G	H	I	J	K
Line No	Rate Schedule	Bill Factor	Meter Size	Gallons		Actual Gallons Consumed (000's)	# of Bills	Billable Gallons (000's)	Volume of Bills	Weight of Max Consumption	Rolling Weight of Consumption
93											
94											
95	345MWCOM		1.5"		Commercial 1.5" Meter	7,217					
96	345MWCOM		1.5"	13,000	First 13,000		202		85	42.08%	42.08%
97	345MWCOM		1.5"	25,000	Next 12,000			1,225	28	13.86%	55.94%
98	345MWCOM		1.5"	50,000	Next 25,000			1,804	46	22.77%	78.71%
99	345MWCOM		1.5"	100,000	Next 50,000			1,079	31	15.35%	94.06%
100	345MWCOM		1.5"	100,001	Over 100,000			1,203	12	5.94%	100.00%
101					**Total Commercial 1.5" Meter**	**7,217**	**202**	**5,310**			
102											
103											
104	345MWGOV		1.5"		Governmental 1.5" Meter	3,591					
105	345MWGOV		1.5"	13,000	First 13,000		60		45	75.00%	75.00%
106	345MWGOV		1.5"	25,000	Next 12,000			155	3	5.00%	80.00%
107	345MWGOV		1.5"	50,000	Next 25,000			275	1	1.67%	81.67%
108	345MWGOV		1.5"	100,000	Next 50,000			550	-	0.00%	81.67%
109	345MWGOV		1.5"	100,001	Over 100,000			2,342	11	18.33%	100.00%
110					**Total Governmental 1.5" Meter**	**3,591**	**60**	**3,322**			
111											
112											
113	345MWIND		1.5"		Industrial 1.5" Meter	1,541					
114	345MWIND		1.5"	13,000	First 13,000		24		7	29.17%	29.17%
115	345MWIND		1.5"	25,000	Next 12,000			197	1	4.17%	33.33%
116	345MWIND		1.5"	50,000	Next 25,000			335	5	20.83%	54.17%
117	345MWIND		1.5"	100,000	Next 50,000			505	2	8.33%	62.50%
118	345MWIND		1.5"	100,001	Over 100,000			256	9	37.50%	100.00%
119					**Total Industrial 1.5" Meter**	**1,541**	**24**	**1,292**			
120											

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	A	B	C	D	E	F	G	H	I	J	K
Line No	Rate Schedule	Bill Factor	Meter Size	Gallons		Actual Gallons Consumed (000's)	# of Bills	Billable Gallons (000's)	Volume of Bills	Weight of Max Consumption	Rolling Weight of Consumption
121											
122	345MWCOM		2"		Commercial 2" Meter	26,053					
123	345MWCOM		2"	21,400	First 21,400		358		180	50.28%	50.28%
124	345MWCOM		2"	25,000	Next 3,600			611	14	3.91%	54.19%
125	345MWCOM		2"	50,000	Next 25,000			3,468	54	15.08%	69.27%
126	345MWCOM		2"	100,000	Next 50,000			4,823	35	9.78%	79.05%
127	345MWCOM		2"	100,001	Over 100,000			11,660	75	20.95%	100.00%
128					**Total Commercial 2" Meter**	**26,053**	**358**	**20,562**			
129											
130											
131	345MWIND		2"		Industrial 2" Meter	618					
132	345MWIND		2"	21,400	First 21,400		35		23	65.71%	65.71%
133	345MWIND		2"	25,000	Next 3,600			43	-	0.00%	65.71%
134	345MWIND		2"	50,000	Next 25,000			225	8	22.86%	88.57%
135	345MWIND		2"	100,000	Next 50,000			28	4	11.43%	100.00%
136	345MWIND		2"	100,001	Over 100,000			-	-	0.00%	100.00%
137					**Total Industrial 2" Meter**	**618**	**35**	**296**			
138											
139											
140	345MWGOV		2"		Governmental 2" Meter	5,920					
141	345MWGOV		2"	21,400	First 21,400		192		119	61.98%	61.98%
142	345MWGOV		2"	25,000	Next 3,600			247	7	3.65%	65.63%
143	345MWGOV		2"	50,000	Next 25,000			1,193	33	17.19%	82.81%
144	345MWGOV		2"	100,000	Next 50,000			1,143	21	10.94%	93.75%
145	345MWGOV		2"	100,001	Over 100,000			1,156	12	6.25%	100.00%
146					**Total Governmental 2" Meter**	**5,920**	**192**	**3,738**			
147											
148											

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	A	B	C	D	E	F	G	H	I	J	K
Line No	Rate Schedule	Bill Factor	Meter Size	Gallons		Actual Gallons Consumed (000's)	# of Bills	Billable Gallons (000's)	Volume of Bills	Weight of Max Consumption	Rolling Weight of Consumption
149											
150	345MWCOM		3"		Commercial 3" Meter	3,162					
151	345MWCOM		3"	68,400	First 68,400		36		12	33.33%	33.33%
152	345MWCOM		3"	100,000	Next 31,600			645	7	19.44%	52.78%
153	345MWCOM		3"	100,001	Over 100,000			685	17	47.22%	100.00%
154					**Total Commercial 3" Meter**	**3,162**	**36**	**1,329**			
155											
156											
157	345MWGOV		3"		Governmental 3" Meter	5,716					
158	345MWGOV		3"	68,400	First 68,400		48		36	75.00%	75.00%
159	345MWGOV		3"	100,000	Next 31,600			379	-	0.00%	75.00%
160	345MWGOV		3"	100,001	Over 100,000			4,290	12	25.00%	100.00%
161					**Total Governmental 3" Meter**	**5,716**	**48**	**4,669**			
162											
163											
164	345MWIND		3"		Industrial 3" Meter	9,275					
165	345MWIND		3"	68,400	First 68,400		12		-	0.00%	0.00%
166	345MWIND		3"	100,000	Next 31,600			379	-	0.00%	0.00%
167	345MWIND		3"	100,001	Over 100,000			8,075	12	100.00%	100.00%
168					**Total Industrial 3" Meter**	**9,275**	**12**	**8,454**			
169											
170											
171	345MWCOM		4"		Commercial 4" Meter	1,951					
172	345MWCOM		4"	127,500	First 127,500		12				
173	345MWCOM		4"	127,501	Over 127,500			464			
174					**Total Commercial 4" Meter**	**1,951**	**12**	**464**			
175											
176											
177	345MWGOV		4"		Governmental 4" Meter	371					
178	345MWGOV		4"	127,500	First 127,500		12				
179	345MWGOV		4"	127,501	Over 127,500			-			
180					**Total Governmental 4" Meter**	**371**	**12**	**-**			
181											
182											
183	345MWIND		4"		Industrial 4" Meter	1,444					
184	345MWIND		4"	127,500	First 127,500		12				
185	345MWIND		4"	127,501	Over 127,500			124			
186					**Total Industrial 4" Meter**	**1,444**	**12**	**124**			
187											
188											
189	345MWCOM		6"		Commercial 6" Meter	1,694					
190	345MWCOM		6"	281,500	First 281,500		24				
191	345MWCOM		6"	281,501	Over 281,500			-			
192					**Total Commercial 6" Meter**	**1,694**	**24**	**-**			
193											
194											
195	345MWIND		6"		Industrial 6" Meter	40,318					
196	345MWIND		6"	281,500	First 281,500		12				
197	345MWIND		6"	281,501	Over 281,500			36,940			
198					**Total Industrial 6" Meter**	**40,318**	**12**	**36,940**			
199											
200					**Average Industrial 6" Bill**						

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	A	B	C	D	E	F	G	H	I	J	K
Line No	Rate Schedule	Bill Factor	Meter Size	Gallons		Actual Gallons Consumed (000's)	# of Bills	Billable Gallons (000's)	Volume of Bills	Weight of Max Consumption	Rolling Weight of Consumption
225											
226					**CLINTON**						
227	345CWRES		5/8"		Residential 5/8" Meter	775					
228	345CWRES	345CWUT1	5/8"	1,000	First 1,000		225		14	6.22%	6.22%
229	345CWRES	345CWUT2	5/8"	10,000	Next 9,000			497	205	91.11%	97.33%
230	345CWRES	345CWUT3	5/8"	25,000	Next 15,000			54	3	1.33%	98.67%
231	345CWRES	345CWUT4	5/8"	50,000	Next 25,000			6	3	1.33%	100.00%
232	345CWRES	345CWUT5	5/8"	100,000	Next 50,000			-	-	0.00%	100.00%
233	345CWRES	345CWUT6	5/8"	100,001	Over 100,000			-	-	0.00%	100.00%
234					**Total Residential 5/8" Meter**	**775**	**225**	**557**			
235											
236											
237	345CWCOM		5/8"		Commercial 5/8" Meter	114					
238	345CWCOM	345CWUT1	5/8"	1,000	First 1,000		46		19	41.30%	41.30%
239	345CWCOM	345CWUT2	5/8"	10,000	Next 9,000			77	26	56.52%	97.83%
240	345CWCOM	345CWUT3	5/8"	25,000	Next 15,000			1	1	2.17%	100.00%
241	345CWCOM	345CWUT4	5/8"	50,000	Next 25,000			-	-	0.00%	100.00%
242	345CWCOM	345CWUT5	5/8"	100,000	Next 50,000			-	-	0.00%	100.00%
243	345CWCOM	345CWUT6	5/8"	100,001	Over 100,000			-	-	0.00%	100.00%
244					**Total Commercial 5/8" Meter**	**114**	**46**	**78**			
245											
246											
247	345CWGOV		5/8"		Governmental 5/8" Meter	64					
248	345CWGOV	345CWUT1	5/8"	1,000	First 1,000		24		10	41.67%	41.67%
249	345CWGOV	345CWUT2	5/8"	10,000	Next 9,000			34	13	54.17%	95.83%
250	345CWGOV	345CWUT3	5/8"	25,000	Next 15,000			8	1	4.17%	100.00%
251	345CWGOV	345CWUT4	5/8"	50,000	Next 25,000			-	-	0.00%	100.00%
252	345CWGOV	345CWUT5	5/8"	100,000	Next 50,000			-	-	0.00%	100.00%
253	345CWGOV	345CWUT6	5/8"	100,001	Over 100,000			-	-	0.00%	100.00%
254					**Total Governmental 5/8" Meter**	**64**	**24**	**42**			
255											
256											
257	345CWRES		3/4"		Residential 3/4" Meter	17,815					
258	345CWRES	345CWUT1	3/4"	1,000	First 1,000		5,588		907	16.23%	16.23%
259	345CWRES	345CWUT2	3/4"	10,000	Next 9,000			11,944	4,559	81.59%	97.82%
260	345CWRES	345CWUT3	3/4"	25,000	Next 15,000			615	105	1.88%	99.70%
261	345CWRES	345CWUT4	3/4"	50,000	Next 25,000			143	16	0.29%	99.98%
262	345CWRES	345CWUT5	3/4"	100,000	Next 50,000			6	1	0.02%	100.00%
263	345CWRES	345CWUT6	3/4"	100,001	Over 100,000			-	-	0.00%	100.00%
264					**Total Residential 3/4" Meter**	**17,815**	**5,588**	**12,708**			
265											
266											
267	345CWCOM		3/4"		Commercial 3/4" Meter	2,543					
268	345CWCOM	345CWUT1	3/4"	1,000	First 1,000		663		344	51.89%	51.89%
269	345CWCOM	345CWUT2	3/4"	10,000	Next 9,000			1,289	259	39.06%	90.95%
270	345CWCOM	345CWUT3	3/4"	25,000	Next 15,000			366	50	7.54%	98.49%
271	345CWCOM	345CWUT4	3/4"	50,000	Next 25,000			149	6	0.90%	99.40%
272	345CWCOM	345CWUT5	3/4"	100,000	Next 50,000			152	1	0.15%	99.55%
273	345CWCOM	345CWUT6	3/4"	100,001	Over 100,000			168	3	0.45%	100.00%
274					**Total Commercial 3/4" Meter**	**2,543**	**663**	**2,124**			
275											
276											
277	345CWGOV		3/4"		Governmental 3/4" Meter	628					
278	345CWGOV	345CWUT1	3/4"	1,000	First 1,000		108		36	33.33%	33.33%
279	345CWGOV	345CWUT2	3/4"	10,000	Next 9,000			267	56	51.85%	85.19%
280	345CWGOV	345CWUT3	3/4"	25,000	Next 15,000			170	9	8.33%	93.52%
281	345CWGOV	345CWUT4	3/4"	50,000	Next 25,000			61	6	5.56%	99.07%
282	345CWGOV	345CWUT5	3/4"	100,000	Next 50,000			49	1	0.93%	100.00%
283	345CWGOV	345CWUT6	3/4"	100,001	Over 100,000			-	-	0.00%	100.00%
284					**Total Governmental 3/4" Meter**	**628**	**108**	**547**			
285											

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	A	B	C	D	E	F	G	H	I	J	K
Line No	Rate Schedule	Bill Factor	Meter Size	Gallons		Actual Gallons Consumed (000's)	# of Bills	Billable Gallons (000's)	Volume of Bills	Weight of Max Consumption	Rolling Weight of Consumption
286											
287	345CWCOM		1"		Commercial 1" Meter	266					
288	345CWCOM	345CWUT1	1"	5,300	First 5,300		36		28	77.78%	77.78%
289	345CWCOM	345CWUT2	1"	9,000	Next 3,700			30	-	0.00%	77.78%
290	345CWCOM	345CWUT3	1"	24,000	Next 15,000			94	3	8.33%	86.11%
291	345CWCOM	345CWUT4	1"	49,000	Next 25,000			32	5	13.89%	100.00%
292	345CWCOM	345CWUT5	1"	99,000	Next 50,000			-	-	0.00%	100.00%
293	345CWCOM	345CWUT6	1"	100,001	Over 100,000			-	-	0.00%	100.00%
294					**Total Commersial 1" Meter**	**266**	**36**	**156**			
295											
296											
297	345CWGOV		1"		Governmental 1" Meter	163					
298	345CWGOV	345CWUT1	1"	5,300	First 5,300		48		34	70.83%	70.83%
299	345CWGOV	345CWUT2	1"	9,000	Next 3,700			49	6	12.50%	83.33%
300	345CWGOV	345CWUT3	1"	24,000	Next 15,000			13	8	16.67%	100.00%
301	345CWGOV	345CWUT4	1"	49,000	Next 25,000			-	-	0.00%	100.00%
302	345CWGOV	345CWUT5	1"	99,000	Next 50,000			-	-	0.00%	100.00%
303	345CWGOV	345CWUT6	1"	100,001	Over 100,000			-	-	0.00%	100.00%
304					**Total Governmental 1" Meter**	**163**	**48**	**62**			
305											
306											
307	345CWMLT		1"		Multi Residential 1" Meter	1,344					
308	345CWMLT	345CWUT1	1"	5,300	First 5,300		84		-	0.00%	0.00%
309	345CWMLT	345CWUT2	1"	9,000	Next 3,700			300	8	9.52%	9.52%
310	345CWMLT	345CWUT3	1"	24,000	Next 15,000			547	68	80.95%	90.48%
311	345CWMLT	345CWUT4	1"	49,000	Next 25,000			53	8	9.52%	100.00%
312	345CWMLT	345CWUT5	1"	99,000	Next 50,000			-	-	0.00%	100.00%
313	345CWMLT	345CWUT6	1"	100,001	Over 100,000			-	-	0.00%	100.00%
314					**Total Multi Residential 1" Meter**	**1,344**	**84**	**899**			
315											

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	A	B	C	D	E	F	G	H	I	J	K
Line No	Rate Schedule	Bill Factor	Meter Size	Gallons		Actual Gallons Consumed (000's)	# of Bills	Billable Gallons (000's)	Volume of Bills	Weight of Max Consumption	Rolling Weight of Consumption
316											
317	345CWCOM		1.5"		Commercial 1.5" Meter	1,564					
318	345CWCOM		1.5"	11,200	First 11,200		24		3	12.50%	12.50%
319	345CWCOM		1.5"	25,000	Next 13,800			203	8	33.33%	45.83%
320	345CWCOM		1.5"	50,000	Next 25,000			301	1	4.17%	50.00%
321	345CWCOM		1.5"	100,000	Next 50,000			536	5	20.83%	70.83%
322	345CWCOM		1.5"	100,001	Over 100,000			258	7	29.17%	100.00%
323					**Total Commercial 1.5" Meter**	**1,564**	**24**	**1,298**			
324											
325											
326	345CWGOV		1.5"		Governmental 1.5" Meter	2,223					
327	345CWGOV		1.5"	11,200	First 11,200		35		11	31.43%	31.43%
328	345CWGOV		1.5"	25,000	Next 13,800			321	1	2.86%	34.29%
329	345CWGOV		1.5"	50,000	Next 25,000			528	4	11.43%	45.71%
330	345CWGOV		1.5"	100,000	Next 50,000			735	7	20.00%	65.71%
331	345CWGOV		1.5"	100,001	Over 100,000			351	12	34.29%	100.00%
332					**Total Governmental 1.5" Meter**	**2,223**	**35**	**1,934**			
333											
334											
335	345CWRES		2"		Residential 2" Meter	-					
336	345CWRES		2"	17,600	First 17,600		-				
337	345CWRES		2"	25,000	Next 7,400			-			
338	345CWRES		2"	50,000	Next 25,000			-			
339	345CWRES		2"	100,000	Next 50,000			-			
340	345CWRES		2"	100,001	Over 100,000			-			
341					**Total Residential 2" Meter**	-	-	-			
342											
343											
344	345CWCOM		2"		Commercial 2" Meter	1,607					
345	345CWCOM		2"	17,600	First 17,600		12		-	0.00%	0.00%
346	345CWCOM	345CWUT3	2"	25,000	Next 7,400			89	-	0.00%	0.00%
347	345CWCOM	345CWUT4	2"	50,000	Next 25,000			300	-	0.00%	0.00%
348	345CWCOM	345CWUT5	2"	100,000	Next 50,000			600	-	0.00%	0.00%
349	345CWCOM	345CWUT6	2"	100,001	Over 100,000			407	12	100.00%	100.00%
350					**Total Commercial 2" Meter**	**1,607**	**12**	**1,396**			
351											
352											
353	345CWGOV		2"		Governmental 2" Meter	1,200					
354	345CWGOV		2"	17,600	First 17,600		36		24	66.67%	66.67%
355	345CWGOV		2"	25,000	Next 7,400			89	-	0.00%	66.67%
356	345CWGOV		2"	50,000	Next 25,000			293	1	2.78%	69.44%
357	345CWGOV		2"	100,000	Next 50,000			426	5	13.89%	83.33%
358	345CWGOV		2"	100,001	Over 100,000			127	6	16.67%	100.00%
359					**Total Governmental 2" Meter**	**1,200**	**36**	**935**			
360											
361											
362	345CWMLT		2"		Multi Residential 2" Meter	294					
363	345CWMLT	345CWUT1	2"	17,600	First 17,600		12		-	0.00%	0.00%
364	345CWMLT	345CWUT2	2"	25,000	Next 7,400			65	6	50.00%	50.00%
365	345CWMLT	345CWUT3	2"	50,000	Next 25,000			18	6	50.00%	100.00%
366	345CWMLT	345CWUT4	2"	100,000	Next 50,000			-	-	0.00%	100.00%
367	345CWMLT	345CWUT5	2"	100,001	Over 100,000			-	-	0.00%	100.00%
368					**Total Multi Residential 2" Meter**	**294**	**12**	**83**			
369											
370											
371	345CWCOM		6"		Commercial 6" Meter	-					
372	345CWCOM		6"		First 250,000		-				
373	345CWCOM		6"		Next 250,000			-			
374					**Total Commercial 6" Meter**	-	-	-			
375											

25. Reference: Direct Testimony of Brian N. Halloran, p. 17 line 3 through p. 18 line 8. Did the Company perform any analysis of the impact on customers' bills for customers other than the average or typical customer of each meter size? If so, please provide all such analyses. If not, why not?

Response: The Company did not analyze the impact on customers' bills other than the impact to an average customers' bills. The Company believes customers with like meter sizes and like classifications have similar consumption behaviors and has analyzed and presented information in this manner.

Witness: Brian Halloran

26. Reference: Exhibit 7. Do the data in the Usage Table represent actual test period consumption or adjusted test period consumption?

    Response: The data represents adjusted test period consumption.

    Witness: Brian Halloran

27. Please provide the C.V. of all individuals providing direct testimony on behalf of WSCK.

Response: No such documents exist. Educational and professional backgrounds of all who are providing direct testimony can be found in each person's direct testimony.

Witness: Brian Halloran

28. Provide a description and dollar amount for the three largest expense increases – in order from greatest to least –WSCK has incurred since their last general rate case.

Response: Please see the listing below for a description and dollar amount of the three largest expense increases, in order from greatest to least, that WSCK has incurred since our last general rate case:

1) Depreciation Expense – approximately $151,000

2) Total Salaries & Wages (General and Maintenance) – approximately $53,000

3) Pension and Other Benefits – approximately $43,000

Witness: Brian Halloran

29. What is the uncollectable rate WSCK used to calculate uncollectible expense? How did WSCK determine this was the appropriate rate to use?

Response: The uncollectible rate WSCK used to calculate uncollectible expense is calculated by taking "Per Books Uncollectible Expense" divided by "Per Books Water Service Revenues", or $41,829 ÷ $2,107,765, which equals approximately 1.98%. WSCK determined this rate to be appropriate because it is based on actual results.

Witness: Brian Halloran

30. Since the last WSCK general rate case, what additional steps has WSCK taken to limit uncollectable accounts?

Response: WSCK has taken some additional steps since the last general rate case to limit the uncollectable accounts. For customers served by WSCK, Customer Service agents for UI are running the "Active Collections Process" report once per week. The agent will place courtesy calls to WSCK customers with past due accounts that have been already been issued a "10 day Collection Letter". After the courtesy call has been placed, the agent will follow up on the account to ensure the payment has been applied to the account or check the account to see if any further action is necessary to collect any past due payments owed to WSCK.

Witness: Brian Halloran

31. Please identify the members of WSCK's board of directors.

Response: The members of WSCK's board of directors are listed below:

- Lisa Sparrow
- Hamish Cumming
- Bruce Anderson
- Carol Wozney

Witness: Brian Halloran

32. Please provide board of directors meeting minutes for any meetings where discussion and approval of the application to seek a rate increase were discussed.

Response: No such document exists.

Witness: Brian Halloran

33. For each member of the WSCK board of directors

    a. Indicate whether the director also serves as a director or an officer of Utilities, Inc., or a Utilities, Inc., subsidiary; and,
    b. If applicable, identify the corresponding affiliate and position held.

Response: See below for the Company's response.

Utilities, Inc. - Director / President: Lisa Sparrow
Director: Hamish Cumming

Subsidiary/Affiliate

Water Service Corporation - Director / President: Lisa Sparrow
Director: Hamish Cumming
Director: Bruce Anderson
Director: Carol Wozney

For the below listed subsidiaries: Director: Lisa Sparrow
Director: Hamish Cumming
Director: Bruce Anderson
Director: Carol Wozney

ACME Water Supply and Management Company
Community Utilities of Florida, Inc.
Utilities, Inc. of Florida
Bradfield Farms Water Company
Carolina Trace – Utilities, Inc.
Carolina Water Service, Inc. of North Carolina
CWS Systems, Inc.
Elk River Utilities, Inc.
Transylvania Utilities, Inc.
Tennessee Water Service, Inc.
Utility Services of Illinois, Inc.
Community Utilities of Indiana Inc.
Community Utilities of Pennsylvania Inc.
Community Utilities of Maryland Inc.
Green Ridge Utilities, Incorporated
Maryland Water Service, Inc.
Provinces Utilities, Inc.
Montague Sewer Co., Inc.
Montague Water Co., Inc.

Colchester Utilities, Inc.
Massanutten Public Service Corporation
Community Utilities of New York, Inc.

For the below listed subsidiaries: Director / President: Lisa Sparrow

Holiday Service Corp.
North Topsail Utilities, Inc.

For the below listed subsidiaries: Director: Lisa Sparrow

Community Utilities of South Carolina Inc.
Tega Cay Water Service, Inc.
Carolina Water Service, Inc.
Bermuda Water Company
American Resources Development Company
Perkins Mountain Utility Company
Perkins Mountain Water Company
Sky Ranch Water Service Corp.
Spring Creek Utilities Co.
UICN Real Estate Holdings, Inc.
Utilities Inc. of Nevada
Utilities, Inc. of Central Nevada
Community Utilities of Louisiana Inc.
Louisiana Water Service, Inc.
Utilities, Inc. of Louisiana
Community Utilities of Georgia Inc.
Utilities, Inc. of Georgia
Water Service Company of Georgia, Inc.
Charleston Utilities Inc.
Community Utilities of Alabama Inc.

Witness: Brian Halloran

34. Please identify the officers of WSCK.

Response: See below for the officers of WSCK:

Steve Lubertozzi	President
Bruce Haas	Vice President
John Stover	Vice President and Secretary
Debra Plumb	Assistant Secretary
Cheryl Hsu	Assistant Secretary
Jim Andrejko	Treasurer

Witness: Brian Halloran

35. Please itemize all costs charged to WSCK by the Service Company in each of the past three years. For each year, please separately identify the costs that were a) directly charged to WSCK and b) allocated to WSCK based on a common allocation factor.

Response: Please see the attached files for operating costs allocated to WSCK, labeled *"AG DR 1.35 – 2013 WSC Allocations", "AG DR 1.35 – 2014 WSC Allocations", and "AG DR 1.35 – 2015 WSC Allocations"* for the Company's response. Please be advised all costs charged to WSCK from the Service Company are allocated based on an allocation factor which is dependent on WSCK's customer base as a percentage of UI's customer base.

Witness: Brian Halloran

AG DR 1.35

2013 WSC Allocations

Water Service Corporation of Kentucky, Inc. - WSC Allocations
YTD - 2013

WSCKY (WSC Allocation)	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13
BAD DEBT EXPENSE	33	54	48	66	51	67	53	23	92	44	40	61
BILLING & CUSTOMER SERVICE	2,209	1,409	1,158	2,468	1,878	1,929	1,579	1,948	1,743	1,820	1,765	1,648
EMPLOYEE BENEFITS	10,111	11,973	8,643	9,963	10,637	11,790	10,016	9,068	13,419	11,123	13,704	10,063
INSURANCE EXPENSE	3,442	5,715	6,010	6,241	5,951	5,178	5,358	4,006	6,997	5,868	5,369	6,683
IT DEPARTMENT	3,810	3,357	3,778	3,732	3,714	3,926	4,358	3,992	4,130	4,153	4,158	4,163
MISCELLANEOUS EXPENSE	261	494	325	373	178	222	254	281	300	339	470	805
OFFICE EXPENSE	277	286	373	143	263	222	199	345	109	315	190	356
OFFICE UTILITIES/MAINTENANC	2,785	2,900	2,928	2,926	3,001	2,800	2,810	2,825	2,873	2,932	2,767	2,934
OUTSIDE SERVICE EXPENSE	2,163	2,312	1,871	2,381	1,807	1,953	1,910	292	1,259	2,186	2,530	4,660
RENT EXPENSE	40	39	40	40	41	42	43	43	43	43	42	42
SALARIES & WAGES	13,129	12,661	12,742	13,030	12,983	13,370	12,144	12,130	12,181	12,465	12,402	2,769
TRAVEL EXPENSE	340	495	621	697	824	267	599	202	148	245	131	468
FLEET TRANSPORTATION EXPENS	11	16	25	13	37	14	(62)	-	2	1	6	6
MAINTENANCE-WTR&SWR PLANT	-	-	-	-	-	-	-	-	-	-	(2)	-
PAYROLL TAXES	1,563	1,256	1,858	684	636	607	546	545	502	519	514	538
PROPERTY & OTHER TAXES	294	293	292	292	292	292	292	291	292	(1,935)	(4,024)	5,453
TOTAL O&M/TOTI	**40,468**	**43,260**	**40,711**	**43,047**	**42,293**	**42,679**	**40,099**	**35,988**	**44,089**	**40,118**	**40,064**	**40,649**

AG DR 1.35

2014 WSC Allocations

Water Service Corporation of Kentucky, Inc. - WSC Allocations
YTD - 2014

WSCKY (WSC Allocation)	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14
BAD DEBT EXPENSE	39	60	59	65	69	69	55	54	70	91	52	39
BILLING & CUSTOMER SERVICE	2,071	1,623	1,879	1,917	2,104	1,400	2,141	2,260	1,057	2,315	1,832	1,294
EMPLOYEE BENEFITS	14,147	8,831	11,485	7,085	9,891	11,189	13,389	9,948	11,855	13,876	11,106	15,064
INSURANCE EXPENSE	5,306	7,828	6,100	6,179	6,332	5,185	6,729	6,465	5,380	5,203	7,807	5,215
IT DEPARTMENT	2,015	2,472	1,662	1,997	1,840	1,761	1,822	1,742	1,593	2,056	2,191	2,086
MISCELLANEOUS EXPENSE	350	252	236	1,824	628	292	898	435	414	530	315	590
OFFICE EXPENSE	235	326	290	271	337	184	169	208	162	231	212	396
OFFICE UTILITIES/MAINTENANC	2,691	2,737	2,746	2,839	2,708	2,251	2,893	2,896	2,589	3,646	2,601	3,344
OUTSIDE SERVICE EXPENSE	1,713	1,651	1,633	2,004	1,752	3,850	3,704	1,750	5,538	5,568	7,931	11,006
RENT EXPENSE	42	42	43	43	44	90	-	47	93	(9)	55	46
SALARIES & WAGES	10,961	10,852	10,794	12,315	11,579	14,315	10,796	13,910	10,806	11,199	10,596	11,225
TRAVEL EXPENSE	153	314	506	632	61	48	711	77	87	142	98	164
FLEET TRANSPORTATION EXPENS	3	2	1	-	2	23	9	6	5	5	14	3
MAINTENANCE-WTR&SWR PLANT	-	-	-	-	-	-	4	-	-	-	-	-
PAYROLL TAXES	1,416	1,172	951	1,174	784	757	671	691	649	670	591	662
PROPERTY & OTHER TAXES	(808)	(619)	1,942	171	171	171	173	173	172	171	170	150
TOTAL O&M/TOTI	**40,336**	**37,542**	**40,327**	**38,517**	**38,303**	**41,584**	**44,163**	**40,661**	**40,471**	**45,693**	**45,571**	**51,286**

AG DR 1.35

2015 WSC Allocations

Water Service Corporation of Kentucky, Inc. - WSC Allocations

YTD - 2015

WSCKY (WSC Allocation)	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15
BAD DEBT EXPENSE	27	(23)	60	53	37	34	29	32	24	36	34
BILLING & CUSTOMER SERVICE	2,378	1,560	1,882	2,018	1,748	2,122	1,696	2,268	1,806	1,891	1,696
EMPLOYEE BENEFITS	18,949	13,545	11,347	10,267	11,550	16,087	11,975	14,009	9,417	13,488	14,007
INSURANCE EXPENSE	5,170	4,638	5,033	5,578	5,588	6,295	6,577	5,265	6,202	7,651	9,324
IT DEPARTMENT	1,394	1,435	2,503	2,175	2,163	2,101	1,906	2,324	2,298	2,787	2,362
MISCELLANEOUS EXPENSE	176	150	1,483	347	225	357	62	135	221	273	263
OFFICE EXPENSE	91	263	346	188	157	172	289	85	138	309	271
OFFICE UTILITIES/MAINTENANC	2,825	2,972	3,011	3,035	2,951	3,187	3,063	2,947	2,697	3,269	2,975
OUTSIDE SERVICE EXPENSE	2,335	2,207	2,229	2,230	2,124	2,153	2,454	1,774	2,340	2,708	2,788
RENT EXPENSE	46	45	46	46	48	48	50	49	49	49	49
SALARIES & WAGES	9,512	9,013	9,599	10,481	9,404	9,682	10,269	9,121	9,837	9,696	12,013
TRAVEL EXPENSE	38	212	728	726	(426)	103	120	49	118	101	200
FLEET TRANSPORTATION EXPENS	29	7	5	8	19	24	8	8	7	10	15
MAINTENANCE-WTR&SWR PLANT	-	-	8	-	0	60	(6)	-	-	-	-
PAYROLL TAXES	1,123	1,079	885	760	653	675	682	630	611	599	588
PROPERTY & OTHER TAXES	209	205	204	205	204	205	205	204	203	202	203
TOTAL O&M/TOTI	**44,300**	**37,308**	**39,368**	**38,116**	**36,446**	**43,304**	**39,377**	**38,901**	**35,969**	**43,070**	**46,786**

36. Provide the percentage of salary and wage increases granted in each of the last three years, as well as the dates of any such increases. Please provide this information separately for union and non-union personnel, if applicable.

Response: Please refer to the table below for a summary of KY employees who have received salary and wage increases in the last three years. The dates shown are the dates when the increases became effective.

Response to AG DR 1.36

	Date Entered					
Last Name, First Name	**04/16/2013**	**04/23/2013**	**04/24/2013**	**04/09/2014**	**04/09/2015**	**07/10/2015**
BOLT, GREGORY C.				2.84%	2.76%	
JOHNSON, HARVEY H.				2.83%	2.75%	
JOHNSTON, JOSEPH A				3.07%	2.98%	
KILLION, JEFFREY						
LEONARD, JAMES R.				3.00%	3.00%	
MAGUIRE, JOE						
MILLS, WENDELL G.				3.02%	3.26%	
ONKST, JAMES H.				2.99%	3.03%	
PARTIN, MICHAEL W.				3.14%	2.99%	13.26%
RUSHING, RONALD	3.00%			2.83%	2.75%	
SANDEFUR, BRYAN K.				2.80%	2.73%	
TURNER, JOHN R.	2.99%			2.01%	2.73%	
VAUGHN, STEPHEN R.		13.35%	13.35%	4.48%	4.00%	
WILSON, COLBY						
ZUMBRUM, JACOB						

Witness: Brian Halloran

37. Provide the number of WSCK employee positions, by department, authorized and the actual number of employees for each month from January 2013 through the latest date available.

Response: The number of WSCK employee positions that have been authorized for each month since January 2013 is equal to 11. Below are the actual headcount totals for WSCK employee positions by month and year:

Response to AG DR 1.37

2013

Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
11	11	11	11	11	11	11	11	11	11	11	11

2014

Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
11	11	11	11	11	11	11	11	11	11	11	11

2015

Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
11	11	11	11	11	10	11	11	9	10	11	11

Witness: Brian Halloran

38. Provide water loss annual totals and rates.

Response: See chart below showing data in 1,000 gallons.

	Middlesboro				*Clinton*			
	Produced	**Sold**	**Used**	**Loss (%)**	**Produced**	**Sold**	**Used**	**Loss (%)**
July 14	36,013	33,330	1,714	2.69%	3,306	2,487	369	13.61%
Aug 14	35,383	32,616	1,557	3.42%	3,270	2,316	163	24.19%
Sept 14	35,804	33,124	3,044	-1.02%	2,826	2,624	102	3.54%
Oct 14	35,514	31,667	1,824	5.70%	2,678	2,572	133	-1.01%
Nov 14	33,331	30,576	1,497	3.77%	2,751	2,330	244	6.43%
Dec 14	34,526	29,813	1,347	9.75%	2,616	2,355	37	8.56%
Jan 15	36,240	32,644	907	7.42%	2,972	2,486	42	14.94%
Feb 15	37,651	28,450	1,137	21.42%	3,150	2,260	233	20.86%
Mar 15	40,369	31,986	2,622	14.27%	3,205	2,747	69	12.14%
Apr 15	34,070	33,909	765	-1.77%	3,209	2,792	340	2.40%
May 15	39,293	32,345	1,378	14.18%	2,960	2,742	111	3.61%
June 15	35,364	34,999	1,241	-2.48%	2,957	2,537	77	11.60%
Test Period Totals	**433,558**	**385,459**	**19,033**	**6.70%**	**35,900**	**30,248**	**1,920**	**10.40%**

Witnesses: Brian Halloran, Bruce Haas

39. Provide water loss reduction plan.

Response: Please refer to the attached file labeled *"AG DR 1.39 – WSCK Leak Detection Program"* for the Company's response.

Witness: Bruce Haas

AG DR 1.39

WSCK Leak Detection Program

Water Service Corporation of Kentucky Leak Detection Program

- Leak Survey Tools
- Monitor Daily Pumping (Read Meter Daily) Investigate High Pumping/Test meters as PSC requirements
- Purchase Water (Read Master Meter Daily) Investigate High Usage/ Test meters as PSC requirements
- Water Loss Report (Statistical Report) Water sold vs. Water Pumped or Purchased
- Operate Water Treatment Plant and pump stations to eliminate Tank Overflows
- Have local Fire dept monitor water used for fires, training, etc.
- Meter all "Bulk Loading Stations" Read meters monthly
- Use WSCK Fire Hydrant meter and Backflow Prevention Device for any water usage on any Fire Hydrant or Flush Hydrant
- Take readings from Plant meter or Master meter when Flushing Fire Hydrant, (Have accurate numbers after completion of system flushing)
- Read Water Meters same time each month
- Have adequate Inventory for Distribution System Repairs
- If water loss exceeds 10% Begin Patrolling the Distribution system or Service area
- Look and Listen for water in ditches, swamps, creeks crossings, etc.
- Educate the customer on notification to Water Service Corp of KY if leaks are spotted or Fire Hydrants have been opened and continue to flow.
- Use (Heath Aqua Scope) listening device on Fire Hydrants and Meter Services. Listen in one service area or subdivision before moving on to other areas. In heavy traffic areas, Leak Survey may continue in night time hours. (When traffic noise is at a minimum)
- Have two Operators at all times when working in area's where traffic is in operation. Employee's wear proper Personal Protective Equipment (PPE) when working around traffic. Reflective Vest, etc.

Components of a Water Loss Prevention Plan

KY Rural Water

By Barry Back, Circuit Rider

Water Proof - Summer 2006

How do the terms "water loss" and "weight gain" relate? Can it be that apathy, procrastination, or plain idleness might apply to both situations? Definitely, good intentions abound with either problem. No one wants to be overweight just as no one who is responsible for the management and operation of a water utility wants to have excessive water loss. How do we attack these problems? In either case, we must identify the root of the problem, focus on a solution and stick with it! How many times have we heard the phrase, "If you fail to plan you plan to fail?" A good plan is the key to any long-term solution.

A person's physical and psychological make-up has a huge impact when attempting to solve the weight problem. Heredity affects us in many ways, but especially in regards to our ability to lose weight. What about the person who accepted the position of manager and soon learned that they had inherited an inadequately operated water system?

Age is another common factor in both problems. A water distribution that was installed in the WPA days of the 1930s will most likely experience problems that newly installed water lines will not possess. The older that I get, the harder it is to keep the weight off! We can list other analogies such as our body shapes and sizes compared to the geographical terrain of our utilities and our distribution system sizes. However, let's get going with a proactive approach to the problem of water loss.

Accurate records are vital to any water loss prevention plan. How do we know the status of our water loss if we do not keep records? There is a water loss template that is available for download from the Kentucky Rural Water Association website (**www.krwa.org**). This Excel spreadsheet, or a similar record keeping system, can be utilized in a preliminary water audit. The initial step in water loss prevention is the water loss calculation. Secondly, we must locate and eliminate all water leaks. Sounds easy, doesn't it?

The following steps can be utilized to prevent or reduce water loss and should be incorporated into a water loss prevention plan:

1. Read the master meters daily and at the same time each day. At a minimum, they should be read Monday through Friday. This will minimize water loss due to a large leak that can go undetected for a week or month.
2. Read all meters in the distribution system within a 3 to 5 day window. When the meters are read over a two-week period, this will cause fluctuations of monthly water loss numbers. However, these numbers will average out over a year's period of time.
3. Divide the distribution system into zones or sub-sections where possible and calculate water loss for each zone. This will allow for the prioritizing of work based upon the severity of the problem in a particular zone.
4. Utilize computer billing software to generate water loss reports for sections or zones as well as generating an overall water loss report.
5. Install by-pass monitor meters as needed to isolate lines with potential leaks. A 5/8 x 3/4-inch meter will suffice for each 100-customer section of line.
6. Install a two-inch by-pass monitor meter at water storage tanks to isolate sections of line with potential leaks during the night (1:00 a.m. - 4:00 a.m.).
7. Utilize pressure recordings to detect fluctuating pressures and abnormally low or high pressures in distribution system lines.
8. Test and change-out all meters according to Kentucky Public Service Commission (PSC) regulations. PSC regulations require residential meters to be tested and changed-out on a ten-year interval. Four-inch and larger meters are to be tested annually.
9. It may be feasible to hire a part-time operator to utilize leak detection equipment to search for leaks. A portion of the distribution system could be covered each month.
10. Identify sections of pipe in the distribution system with the most frequent line breaks. Budgeting for infrastructure replacement is imperative in any water utility.
11. Having a main transmission line from the master meter to a water storage tank will reduce pressure fluctuations in the distribution system and result in fewer line breaks.
12. Provide the necessary resources for manpower and equipment to properly maintain the distribution system appurtenances such as gate valves, pressure reducing valves, and hydrants.

Today's advanced technology can certainly enhance our water loss prevention plan. Computers not only utilize software for spreadsheets to calculate water loss expediently but can be used in a variety of ways to identify areas of the distribution system with potential leaks. Both master meters and customer meters can be read by satellites or other automated meter reading mechanisms. Telemetry/SCADA systems operated with computers can produce trend charts for water flows, water pressures and water levels in storage tanks. This kind of data is valuable in determining where leaks are or are not prevalent. Computers analyze hydraulic data to determine if theoretical and actual water flows and water pressures in the distribution system match. Computerized maps with GPS and GIS data are beneficial when used properly. A water utility's budget is the major limiting factor as to why technology is not used more frequently.

By industry standards, more than 15% water loss in a rural system is unacceptable. Probably, no one realizes this more than the managers of water districts, water associations, and investor-owned utilities under the jurisdiction of the Kentucky Public Service Commission. Just as we should be concerned with our health due to being overweight, the PSC is concerned with the financial health and well-being of water utilities under their jurisdiction in Kentucky. PSC inspectors routinely discuss water loss during their inspections. When a water system exceeds 15% water loss on their annual report to the PSC, a deficiency is issued. Numerous water systems' response to the PSC's Deficiency Tracking Reports (DTR) has been deemed unacceptable by PSC. A common request from PSC to the water system with a deficiency due to water loss is for a water loss control plan. A good water loss control plan should include the above-mentioned components with a time frame to implement the improvements and follow-up evaluations to measure the success of the plan.

Whether we are weighing in or wading in, we should always do so with a goal in mind. We cannot continue to ignore our problem and hope it resolves itself. Just as there are various diets to control an individual's weight, there are various methods for controlling water loss.

Let's start implementing all of our good intentions!

40. For each of the past three WSCK rate case filings, provide:

a. the amount of the increase requested,
b. the percentage increase requested,
c. the amount of increase granted,
d. whether the case was litigated or settled,
e. the total rate case costs incurred, and
f. the effective date of new rates.

Response: Please refer to the table below for the Company's response.

Response to AG DR 1.40

	Case No. 2013-00237	Case No. 2010-00476	Case No. 2008-00563
Amount of Increase Requested	$ 233,411	$ 448,723	$ 807,006
Percentage Increase Requested	11.10%	22.00%	50.08%
Amount of Increase Granted	$ 84,719	$ 68,898	$ 473,182
Litigated or Settled?	Litigated	Litigated	Litigated
Rate Case Costs Incurred	$ 255,488	$ 129,630	$ 160,581
Effective Date of New Rates	7/24/2014	11/23/2011	11/9/2009

Witness: Brian Halloran

41. Provide a copy of all contracts with consultants or other third parties for rate case services claimed in this filing.

Response: There is no written contract with the law firm of Sturgill, Turner, Barker, and Moloney related to legal fees for this rate case. The law firm provides legal services on this matter at an hourly rate of $225 for attorneys, $85 for paralegals, and $40 for law clerks. The firm also charges for some out-of-pocket expenses, such as printing, copying, faxes, and research expenses.

Witness: Brian Halloran

42. Please provide copies of all Requests for Proposal issued by or on behalf of WSCK with regard to the provision of rate case services in this case.

Response: No such document exists.

Witness: Brian Halloran

43. For each of the past three years, please provide:

    a. the capital budget as approved by the Board of Directors,
    b. the actual capital expenditures.

Response: Please refer to the below table:

WSCK Capital Investments

	2013	2014	2015
Budget	$ 140,100	$ 548,448	$ 494,805
Actual	$ 260,551	$ 469,130	$ 721,858

Witness: Brian Halloran

44. For each of the three five years, please provide:

a. actual plant-in-service additions,
b. actual retirements

Response: Please refer to the attached file labeled *"AG DR 1.44 – Plant Bal Retirements & Additions 2012.01.01-2015.06.30"* for support.

a. Please see the table below for a total of actual plant-in-service additions:

Response to AG DR 1.44.a

	2013	2014	2015
Plant Additions	$327,267	$461,197	$450,329

b. Please see the table below for a total of actual retirements:

Response to AG DR 1.44.b

	2013	2014	2015
Plant Retirements	$(45,861)	$ (8,061)	$(13,126)

Witness: Brian Halloran

AG DR 1.44

Plant Bal Retirements & Additions 2012.01.01-2015.06.30

(see attached Excel file)

45. For all amortizations included in the Company's claim, please provide

a. a description of the cost,
b. the total costs incurred,
c. the amortization period being used,
d. a cite to the PSC order authorizing recovery, if applicable,
e. the date when the amortization began,
f. the amount recovered to date, and
g. the amount recovered by the end of the Test Year.

Response: Please refer to the attached file labeled *"AG DR 1.45 – WSCK Amortization"* for the Company's response. Below is a listing of where you can find the response to each questions:

a. Description of the cost: Column B

b. Total Costs Incurred: Column C

c. Amortization period being used: Column J

d. Where applicable, a citation of the PSC order authorizing recovery can be found in Column B.

e. Date when amortization began: Column K.

f. The amount recovered to date: Column H. Please note that asset numbers 1009374, 1009459, and 5000727 are not currently being recovered through rates.

g. The amount recovered by the end of the test year: Column D.

Witness: Brian Halloran

AG DR 1.45

WSCK Amortization

Response to AG DR 1.45

A	B	C	D	E	F	G	H	I	J	K

345.2920 - Rate Case Being Amortized

Asset Number	Asset Description	Cost 6.30.15	A/D 6.30.15	NBV 6.30.15	July - Dec Amort	Cost 12.31.15	A/D 12.31.15	NBV 12.31.15	Amort. Period	Start Amort
1004568	Docket Number 2008-00563	160,581	160,581	-	-	-	-	-	36	11/01/2009
5100007	CP 2010328 2010 R/C WSC KY	129,630	129,630	-	-	-	-	-	36	11/23/2011
5100046	Case No. 2013-00237	255,488	85,513	169,976	(42,581)	255,488	128,094	127,394	36	07/24/2014
	Total	545,700	375,724	169,976	(42,581)	255,488	128,094	127,394		

345.2960 - DEF CHGS-TANK MAINT&REP W

Asset Number	Asset Description	Cost 6.30.15	A/D 6.30.15	NBV 6.30.15	July - Dec Amort	Cost 12.31.15	A/D 12.31.15	NBV 12.31.15	Amort. Period	Start Amort
1006258	HYDRANT PAINTING	28,469	12,653	15,816	(2,372)	28,469	15,025	13,444	72	11/13/2012
1008115	5 YEAR WATER TANK INSPECTION	3,000	501	2,499	(300)	3,000	801	2,199	60	09/11/2014
1008258	3 WATER STORAGE TANKS	3,100	726	2,374	(190)	3,280	1,096	2,184	60	05/19/2014
5000134	PAINT UI LOGO ON ONE 1.2 MILLI	34,526	34,526	-	-	34,526	34,526	-	60	10/03/2007
5000366	WATER STANDPIPE PAINT IN GRUBB	66,616	34,436	32,179	(6,662)	66,616	41,098	25,518	60	12/21/2012
1009374	MIDDLESBORO TANK CLEANING					6,000	504	5,496	36	10/08/2015
1009459	CURRENS COMPANY INC					4,380	146	4,234	60	11/24/2015
5000727	CLINTON KY TANK PAINTING					122,821	4,105	118,716	60	11/23/2015
	Total	135,710	82,842	52,869	(9,524)	269,092	97,301	171,790		

345.3005 - DEF CHGS-VOC TESTING

Asset Number	Asset Description	Cost 6.30.15	A/D 6.30.15	NBV 6.30.15	July - Dec Amort	Cost 12.31.15	A/D 12.31.15	NBV 12.31.15	Amort. Period	Start Amort
1007984	MCCOY & MCCOY LABORATORIES,INC	1,555	432	1,123	(259)	1,555	692	863	36	09/03/2014
1008005	FOUSER ENVIRONMENTAL SVC LTD	900	250	650	(150)	900	400	500	36	09/04/2014
	Total	2,455	683	1,772	(409)	2,455	1,092	1,363		

345.3350 - CIAC-METERS

Asset Number	Asset Description	Cost 6.30.15	A/D 6.30.15	NBV 6.30.15	July - Dec Amort	Cost 12.31.15	A/D 12.31.15	NBV 12.31.15	Amort. Period	Start Amort
1006419	CIAC-METERS	(83,141)	(2,910)	(80,231)	831	(83,141)	(3,741)	(79,400)	600	12/07/2010
	Total	(83,141)	(2,910)	(80,231)	831	(83,141)	(3,741)	(79,400)		

345.3430 - CIAC-OTHER TANGIBLE PLT W

Asset Number	Asset Description	Cost 6.30.15	A/D 6.30.15	NBV 6.30.15	July - Dec Amort	Cost 12.31.15	A/D 12.31.15	NBV 12.31.15	Amort. Period	Start Amort
108606	WATER PLANT-CONVERTED ASSET	(110,815)	(45,833)	(64,982)	1,110	(110,815)	(46,943)	(63,872)	599	12/24/2002
163198	160*AP.INVD*01*31	111	18	92	(1)	111	19	91	600	01/28/2007
163199	160*AP.INVD*01*31	111	18	92	(1)	111	19	91	600	01/28/2007
163200	160*AP.INVD*01*32	111	18	92	(1)	111	19	91	600	01/28/2007
163201	160*AP.INVD*01*32	111	18	92	(1)	111	19	91	600	01/28/2007
163202	160*AP.INVD*01*31	311	53	258	(3)	311	56	255	600	01/28/2007
163203	160*AP.INVD*01*31	396	67	328	(4)	396	71	324	600	01/28/2007
163204	160*AP.INVD*09*20	5,498	861	4,636	(55)	5,498	916	4,581	600	09/25/2007
		(104,169)	(44,778)	(59,391)	1,044	(104,169)	(45,821)	(58,347)		

345.3435 - CIAC-WATER-TAP

Asset Number	Asset Description	Cost 6.30.15	A/D 6.30.15	NBV 6.30.15	July - Dec Amort	Cost 12.31.15	A/D 12.31.15	NBV 12.31.15	Amort. Period	Start Amort
108607	WATER PLANT-CONVERTED ASSET	(221)	(42)	(179)	(52,917)	(221)	(44)	(53,096)	599	1/3/2006
2005171	CASH CIAC-WATER TAP	(51,491)	(2,638)	(48,853)	(57,430)	(57,937)	(3,189)	(106,283)	599	11/1/2007
	Total	(51,712)	(2,680)	(49,032)	(110,347)	(58,158)	(3,234)	(159,379)		