

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**ELECTRONIC APPLICATION OF MONROE )**  
**COUNTY WATER DISTRICT FOR RATE ) CASE NO. 2017-00070**  
**ADJUSTMENT PURSUANT TO 807 KAR 5:076 )**

**RESPONSE OF MONROE COUNTY WATER DISTRICT**  
**TO**  
**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**  
**DATED AUGUST 29, 2017**

**FILED: SEPTEMBER 20, 2017**



**MONROE COUNTY WATER DISTRICT**

**Response To Commission Staff's First Request for Information  
August 29, 2017**

Case No. 2017-00070

Question No. 1

Witness: Jana Dubree

**Q-1.** Refer to Monroe District's Second Supplement to Application, filed July 11, 2017.

- a. State the rate case expense incurred to date;
- b. State the legal expenses incurred to date; and
- c. State the amount of rate case expense incurred to date that is associated with professional accounting services. Provide a copy of each invoice for professional accounting services for the rate case.

**A-1. a.** Monroe County Water District's total rate case expense as of August 31, 2017 is \$20,277.51. These expenses are further broken down as follows:

Legal Fees	\$17,901.51
Accounting Fees	\$ 1,500.00
Publication Fees	\$ 876.00

**b.** As of August 31, 2017, Monroe County Water District's total legal expense related to its application for rate adjustment is \$17,901.51. A copy of invoices supporting legal expenses incurred on and after May 1, 2017 is attached. Please note that on May 19, 2017 and July 11, 2017, Monroe District filed with the Commission invoices to support legal expenses incurred prior to May 1, 2017.

**c.** As of this date, Monroe County Water District has incurred rate case expenses associated with professional accounting services of \$1,500.00. A copy of the invoice supporting this expense is attached.

**STOLL · KEENON · OGDEN**  
PLLC  
2000 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202-2828  
502 333-6000  
Tax ID # 61-0421389  
July 3, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

INVOICE NO.: 856838  
SKO File No.: 118811/156268

**Please Remit This Page With Payment To:**  
**STOLL · KEENON · OGDEN**  
PLLC  
P.O. Box 11969  
Lexington, Kentucky 40579-1969

Re: 2017 Rate Case

Our Reference: 118811/156268/GEW/2404

Fees rendered this bill	\$ 3,886.50
Disbursements	\$ 8.90
<b>Total Current Charges This Matter</b>	<b>\$ 3,895.40</b>

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July 3, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

INVOICE NO.: 856838  
SKO File No.: 118811/156268

MATTER NAME: 2017 Rate Case

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TOTAL FEES FOR PROFESSIONAL SERVICES PER ATTACHED	5,182.00
<i>COURTESY REDUCTION</i>	<i>(1,295.50)</i>
TOTAL CHARGES FOR EXPENSES AND OTHER SERVICES PER ATTACHED	<u>8.90</u>
INVOICE TOTAL	<u>\$ 3,895.40</u>
<b>TOTAL BALANCE DUE</b>	<b><u><u>\$3,895.40</u></u></b>

**BILL DATE:** July 3, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

**LEGAL FEES**

<b>DATE</b>	<b>IND</b>	<b>DESCRIPTION OF SERVICE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
05/01/17	GEW	Review Attorney General's request for information	0.10	320.00	\$ 32.00
05/02/17	GEW	Prepare email message to S. Faulkner Confirming telephone conversation Re: inspection of AWWA and KRWA surveys	0.10	320.00	32.00
05/02/17	GEW	Telephone call to S. Faulkner Re: AG Request for information	0.10	320.00	32.00
05/02/17	GEW	Draft email message to A. Lange Re: disclosure of KRWA wage survey in response to AG Request for information	0.40	320.00	128.00
05/02/17	GEW	Telephone call to J. Dubree Re: AG Request for information	0.00	0.00	0.00
05/03/17	GEW	Prepare a response to AG's request for information	0.40	320.00	128.00
05/04/17	SEM	Review/analyze overtime issues; confer with G. Wuetcher regarding same	0.10	300.00	30.00
05/04/17	GEW	Prepare response to AG's request for information	1.00	320.00	320.00
05/05/17	GEW	Telephone call to J. Dubree Re: response to AG request for information	0.00	0.00	0.00
05/05/17	GEW	Prepare response to AG request for information; revise rate calculations to reflect new debt service requirements	2.20	320.00	704.00
05/08/17	GEW	Email to client re: notice on Facebook page.	0.10	320.00	32.00
05/08/17	GEW	Prepare response to Attorney General's Initial Data Request	2.50	320.00	800.00
05/10/17	GEW	Prepare supplement application; recalculate revenue requirement based upon new debt service requirements	0.90	320.00	288.00

DATE	IND	DESCRIPTION OF SERVICE	HOURS	RATE	AMOUNT
05/10/17	GEW	Prepare a notice of filing of affidavit of publication	0.50	320.00	160.00
05/11/17	GEW	Prepare supplement to application & response to AG's initial data request; forward to client for review	0.50	320.00	160.00
05/12/17	GEW	Telephone conversation with M. Melton Re: non-recurring charges	0.00	0.00	0.00
05/15/17	GEW	Prepare revised non-recurring charge documents for inclusion with supplement to application	2.40	320.00	768.00
05/18/17	GEW	Prepare supplement to application & response to AG's initial data request	1.00	320.00	320.00
05/19/17	GEW	Prepare supplement to application & response to AG's initial data request	0.00	0.00	0.00
05/22/17	GEW	Prepare a motion to incorporate by reference	0.40	320.00	128.00
05/22/17	GEW	Review application to determine the impact of PSC's recent decision on employee benefits	0.00	0.00	0.00
05/23/17	GEW	Prepare and file motion to incorporate by reference	0.90	320.00	288.00
05/23/17	GEW	Email to client re: possible effects of recent PSC decision on employee benefits	0.00	0.00	0.00
05/24/17	GEW	Email to S. M. Faulkner Re: inspection of documents used in rate application	0.10	320.00	32.00
05/31/17	GEW	Meeting with J. Dubree & R. Ross re: rate case issues (Tompkinsville)	2.50	320.00	800.00
05/31/17	GEW	Travel to/from Tompkinsville for meeting with J. Dubree & R. Ross re: rate case issues	0.00	0.00	0.00
<b>SUBTOTAL</b>			<b>16.20</b>		<b>\$5,182.00</b>

**EXPENSES AND OTHER SERVICES**

*\*\*note: all copies are billed at .10/page unless otherwise indicated*

DATE	DESCRIPTION	AMOUNT
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<b>DATE</b>	<b>DESCRIPTION</b>	<b>AMOUNT</b>
05/02/17	Telephone Expense 1(270)487-8131; 54 Mins.	5.50
05/05/17	Telephone Expense 1(270)487-8131; 34 Mins.	3.40
	<b>SUBTOTAL</b>	<b>8.90</b>
<b>GRAND TOTAL:</b>		<b>\$3,895.40</b>

**ATTORNEY/PARALEGAL SUMMARY**

<b>TIMEKEEPER</b>	<b>RANK</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
S. E Miller	Member	0.10	300.00	\$30.00
G. E Wuetcher	Of Counsel	16.10	320.00	\$5,152.00



**STOLL · KEENON · OGDEN**  
PLLC  
2000 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202-2828  
502 333-6000  
Tax ID # 61-0421389  
July 17, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

INVOICE NO.: 858155  
SKO File No.: 118811/156268

**Please Remit This Page With Payment To:**  
**STOLL · KEENON · OGDEN**  
PLLC  
P.O. Box 11969  
Lexington, Kentucky 40579-1969

Re: 2017 Rate Case

Our Reference: 118811/156268/GEW/2404

Fees rendered this bill	\$ 456.00
Disbursements	\$ 138.03
<b>Total Current Charges This Matter</b>	<b>\$ 594.03</b>
Balance as of 07/06/17	\$3,895.40
Less credits (payments, adjustments)	\$0.00
<b>Balance due on prior billings</b>	<b>\$3,895.40</b>
<b>Total Amount Due This Matter</b>	<b>\$4,489.43</b>

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July 17, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

INVOICE NO.: 858155  
SKO File No.: 118811/156268

MATTER NAME: 2017 Rate Case

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TOTAL FEES FOR PROFESSIONAL SERVICES PER ATTACHED	608.00
<b>COURTESY REDUCTION</b>	<b>(152.00)</b>

TOTAL CHARGES FOR EXPENSES AND OTHER SERVICES PER ATTACHED	138.03
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INVOICE TOTAL	<u>\$ 594.03</u>
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BALANCE DUE from previous statements:

Bill Date	Invoice	Outstanding Amount
07/06/17	856838	3,895.40

Total Balance Due on Previous Statements:	\$ 3,895.40
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<b>TOTAL BALANCE DUE</b>	<b><u><u>\$4,489.43</u></u></b>
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**BILL DATE:** July 17, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

**LEGAL FEES**

<b>DATE</b>	<b>IND</b>	<b>DESCRIPTION OF SERVICE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
06/05/17	GEW	Email to AG re: Requests for Information	0.10	320.00	\$ 32.00
06/09/17	GEW	Email to client re: recent PSC decisions on employee benefits	0.20	320.00	64.00
06/09/17	GEW	Telephone call to J. Dubree re: employee benefits	0.40	320.00	128.00
06/30/17	GEW	Prepare email to client re: PSC staff report	0.30	320.00	96.00
06/30/17	GEW	Confer with D. Talley Re: PSC staff report	0.70	320.00	224.00
06/30/17	GEW	Prepare and submit Open Records Act request to PSC re: documents from Case No. 2011-00272	0.20	320.00	64.00
<b>SUBTOTAL</b>			<b>1.90</b>		<b>\$608.00</b>

**EXPENSES AND OTHER SERVICES**

*\*\*note: all copies are billed at .10/page unless otherwise indicated*

<b>DATE</b>	<b>DESCRIPTION</b>	<b>AMOUNT</b>
05/31/17	Long distance transportation, mileage <i>Mileage to Tompkinsville for client meeting</i> <i>VENDOR: Wuetcher, Gerald E; INVOICE#: 060917; DATE: 6/9/2017</i>	138.03
<b>SUBTOTAL</b>		<b>138.03</b>

**GRAND TOTAL:**

**\$594.03**

**ATTORNEY/PARALEGAL SUMMARY**

<b>TIMEKEEPER</b>	<b>RANK</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
G. E Wuetcher	Of Counsel	1.90	320.00	\$608.00

\*PLEASE INDICATE INVOICE NUMBER 858155 ON PAYMENT

**STOLL · KEENON · OGDEN**  
PLLC  
2000 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202-2828  
502 333-6000  
Tax ID # 61-0421389  
August 16, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

INVOICE NO.: 859731  
SKO File No.: 118811/156268

**Please Remit This Page With Payment To:**  
**STOLL · KEENON · OGDEN**  
PLLC  
P.O. Box 11969  
Lexington, Kentucky 40579-1969

Re: 2017 Rate Case

Our Reference: 118811/156268/GEW/2404

Fees rendered this bill	\$ 7,680.00
Disbursements	\$ 253.63
<b>Total Current Charges This Matter</b>	<b>\$ 7,933.63</b>
Balance as of 07/17/17	\$4,489.43
Less credits (payments, adjustments)	\$-3,895.40
<b>Balance due on prior billings</b>	<b>\$594.03</b>
<b>Total Amount Due This Matter</b>	<b>\$8,527.66</b>

**STOLL · KEENON · OGDEN**  
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502 333-6000  
Tax ID # 61-0421389

August 16, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

INVOICE NO.: 859731  
SKO File No.: 118811/156268

MATTER NAME: 2017 Rate Case

TOTAL FEES FOR PROFESSIONAL SERVICES PER ATTACHED		10,240.00	
	<i>COURTESY REDUCTION</i>	<i>(2,560.00)</i>	
TOTAL CHARGES FOR EXPENSES AND OTHER SERVICES PER ATTACHED		<u>253.63</u>	
	INVOICE TOTAL	<u>\$ 7,933.63</u>	
BALANCE DUE from previous statements:			
	<b>Bill Date</b>	<b>Invoice</b>	<b>Outstanding Amount</b>
	07/17/17	858155	594.03
	Total Balance Due on Previous Statements:		\$ 594.03
	<b>TOTAL BALANCE DUE</b>		<b><u><u>\$8,527.66</u></u></b>

**BILL DATE:** August 16, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

**LEGAL FEES**

<b>DATE</b>	<b>IND</b>	<b>DESCRIPTION OF SERVICE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
07/02/17	GEW	Review PSC staff report on Rate application	1.00	320.00	\$ 320.00
07/03/17	GEW	E-mail to J. Dubree re: compliance With 2017-00058 Order; review 2017-00058 case record	0.20	0.00	0.00
07/03/17	GEW	Review E-mail from PSC re: request for documents	0.10	0.00	0.00
07/04/17	GEW	Review staff report; draft memo to board of commissioners	1.00	0.00	0.00
07/04/17	GEW	Email to B. Billingsley re: PSC Staff Report recommendations	0.10	0.00	0.00
07/05/17	GEW	Review staff report; draft memo to board of commissioners	2.00	0.00	0.00
07/06/17	GEW	Conference Call regarding response to PSC Staff Report	1.40	320.00	448.00
07/06/17	GEW	Review Staff Report; prepare options memo for client; email messages to J. Dubree, B. Billingsley & M. Melton re: Staff Report	2.60	0.00	0.00
07/07/17	GEW	Telephone call to AG office (S.M. Faulkner) re: PSC Staff Report	0.30	320.00	96.00
07/07/17	GEW	Prepare option memorandum for client	2.00	320.00	640.00
07/10/17	GEW	Attend and make presentation to board of commissioners meeting	1.50	320.00	480.00
07/10/17	GEW	Travel to/from Tompkinsville, Kentucky to attend board of commissioners meeting	5.00	0.00	0.00
07/12/17	GEW	Prepare conditional waiver/request for hearing & response to PSC Staff Report; confer with D. Talley re: response	6.70	320.00	2,144.00

DATE	IND	DESCRIPTION OF SERVICE	HOURS	RATE	AMOUNT
07/13/17	GEW	Prepare response to PSC staff report	6.10	320.00	1,952.00
07/14/17	GEW	Prepare response to PSC Staff Report	12.00	320.00	3,840.00
07/17/17	MEW	Drafted and filed notice of appearance	0.80	0.00	0.00
07/20/17	MEW	Discussed AG response and strategy with G. Wuetcher and Damon Talley	0.60	0.00	0.00
07/20/17	GEW	Review of AG's Response to Monroe District's conditional waiver/confer with M.E. Wimberly & D. Talley	1.00	320.00	320.00
07/20/17	GEW	E-mail to Monroe District re: AG's Response	0.30	0.00	0.00
<b>SUBTOTAL</b>			<b>44.70</b>		<b>\$10,240.00</b>

**EXPENSES AND OTHER SERVICES**

*\*\*note: all copies are billed at .10/page unless otherwise indicated*

DATE	DESCRIPTION	AMOUNT
07/03/17	Color Replication	102.20
07/10/17	Long distance transportation, mileage <i>Mileage to Tompkinsville for client meeting</i>	147.66
07/18/17	Certified Copies <i>Certified copies of documents</i> <i>VENDOR: Wuetcher, Gerald E; INVOICE#: 071417; DATE: 7/14/2017</i> <i>PAYEE: Kentucky State Treasurer; REQUEST#: 279061; DATE: 7/18/2017.</i>	3.77
<b>SUBTOTAL</b>		<b>253.63</b>
<b>GRAND TOTAL:</b>		<b>\$7,933.63</b>

**ATTORNEY/PARALEGAL SUMMARY**

TIMEKEEPER	RANK	HOURS	RATE	AMOUNT
M. Wimberly	Associate	1.40	0.00	\$0.00
G. E Wuetcher	Of Counsel	43.30	236.49	\$10,240.00



**STOLL · KEENON · OGDEN**  
PLLC  
2000 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202-2828  
502 333-6000  
Tax ID # 61-0421389  
September 15, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

INVOICE NO.: 862793  
SKO File No.: 118811/156268

**Please Remit This Page With Payment To:**  
**STOLL · KEENON · OGDEN**  
PLLC  
P.O. Box 11969  
Lexington, Kentucky 40579-1969

Re: 2017 Rate Case

Our Reference: 118811/156268/GEW/2404

Fees rendered this bill	\$ 2,736.00
Disbursements	\$ 26.45
<b>Total Current Charges This Matter</b>	<b>\$ 2,762.45</b>
Balance as of 08/16/17	\$8,527.66
Less credits (payments, adjustments)	\$-594.03
<b>Balance due on prior billings</b>	<b>\$7,933.63</b>
<b>Total Amount Due This Matter</b>	<b>\$10,696.08</b>

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502 333-6000  
Tax ID # 61-0421389

September 15, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

INVOICE NO.: 862793  
SKO File No.: 118811/156268

MATTER NAME: 2017 Rate Case

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TOTAL FEES FOR PROFESSIONAL SERVICES PER ATTACHED	3,648.00
<b>COURTESY REDUCTION</b>	<b>(912.00)</b>

TOTAL CHARGES FOR EXPENSES AND OTHER SERVICES PER ATTACHED	26.45
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INVOICE TOTAL	<u>\$ 2,762.45</u>
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BALANCE DUE from previous statements:

Bill Date	Invoice	Outstanding Amount
08/16/17	859731	7,933.63

Total Balance Due on Previous Statements:	\$ 7,933.63
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<b>TOTAL BALANCE DUE</b>	<b><u><u>\$10,696.08</u></u></b>
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**BILL DATE:** September 15, 2017

Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

**LEGAL FEES**

<b>DATE</b>	<b>IND</b>	<b>DESCRIPTION OF SERVICE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
08/04/17	GEW	Email message to D. Hinton re: Tompkinsville requested rate increase	0.10	0.00	\$ 0.00
08/08/17	GEW	Email to client re: options in the event of Tompkinsville wholesale rate adjustment filing	2.00	320.00	640.00
08/09/17	GEW	Review email message from PSC staff Re: Tompkinsville wholesale rate adjustment/prepare and send email to client re: wholesale rate filing	0.20	0.00	0.00
08/13/17	GEW	Prepare status report on PSC Cases	1.60	0.00	0.00
08/24/17	GEW	Prepare motion for reconsideration and the clarification	4.00	320.00	1,280.00
08/25/17	GEW	Prepare motion for reconsideration and the clarification	3.00	320.00	960.00
08/25/17	GEW	Call to J. Dubree re: case status update	0.80	0.00	0.00
08/29/17	GEW	Prepare and file motion for reconsideration and clarification	0.80	320.00	256.00
08/29/17	GEW	Review PSC staff request for information	0.10	320.00	32.00
08/30/17	GEW	Email message to client re: newspaper notice of public hearing	0.30	320.00	96.00
08/30/17	GEW	Telephone call to R. Stigall Re: PSC hearing	0.10	0.00	0.00
08/30/17	GEW	Prepare Resolution re: proposed rates	1.20	320.00	384.00
08/30/17	MEW	Discussed BLS study research with Jerry Wuetcher	0.10	0.00	0.00
<b>SUBTOTAL</b>			<b>13.40</b>		<b>\$3,648.00</b>

**EXPENSES AND OTHER SERVICES**

*\*\*note: all copies are billed at .10/page unless otherwise indicated*

<b>DATE</b>	<b>DESCRIPTION</b>	<b>AMOUNT</b>
07/06/17	Conference Call Expense	26.45
	<b>SUBTOTAL</b>	<b>26.45</b>
	<b>GRAND TOTAL:</b>	<b>\$2,762.45</b>

**ATTORNEY/PARALEGAL SUMMARY**

<b>TIMEKEEPER</b>	<b>RANK</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
M. Wimberly	Associate	0.10	0.00	\$0.00
G. E Wuetcher	Of Counsel	13.30	274.29	\$3,648.00

# Campbell, Myers and Rutledge

410 South Broadway  
Glasgow, KY 42141  
270-651-2163

MONROE COUNTY WATER DISTRICT  
205 CAPP HARLIN ROAD  
TOMPKINSVILLE, KY 42167

Invoice No. 27990  
Date 05/25/2017  
Client No. 71571

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2016 Audit Report  
PSC Consulting for rate case

12,000.00  
1,500.00

Current Amount Due \$ 13,500.00

A 1-1/2% FINANCE CHARGE will be made on all balances over 30 days and this is an ANNUAL PERCENTAGE OF 18%.  
CAMPBELL, MYERS & RUTLEDGE

TO PAY BY CREDIT CARD: CLIENT NO.: \_\_\_\_\_ INVOICE NO.: \_\_\_\_\_ PHONE NO.: \_\_\_\_\_  
CHARGE BY: \_\_\_\_\_ AMEX \_\_\_\_\_ MASTERCARD \_\_\_\_\_ VISA \_\_\_\_\_ DISCOVER CHARGE AMT:\$ \_\_\_\_\_  
CREDIT CARD # \_\_\_\_\_ EXPIRATION DATE: \_\_\_\_\_ CVV#(Back of card) \_\_\_\_\_  
CARDHOLDER NAME : \_\_\_\_\_  
CARDHOLDER ADDRESS: \_\_\_\_\_  
CARDHOLDER CITY AND STATE: \_\_\_\_\_ ZIP CODE: \_\_\_\_\_  
CARDHOLDER SIGNATURE: \_\_\_\_\_

Pd. 13500.00  
CK# 29105  
6-15-17