

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

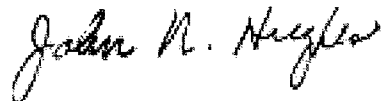
In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE )  
WATER SERVICE RATES OF THE CITY OF PIKEVILLE ) Case No. 2019-00080  
MOUNTAIN WATER DISTRICT )

**SUPPLEMENTAL RESPONSE OF MOUNTAIN WATER DISTRICT  
TO COMMISSION'S SECOND DATA REQUEST**

Mountain Water District, (MWD) by counsel, submits its supplemental responses to the Commission's Second Data request – DR 2-1..

SUBMITTED BY:



John N. Hughes  
124 W. Todd St.  
Frankfort, KY 40601  
502 227 7270  
jnhughes@johnnhughespsc.com

and

Daniel P. Stratton  
Stratton Law Firm PSC  
Post Office Box 1530  
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dan@strattonlaw.net

Attorneys for Mountain  
Water District

# Invoice

Mountain Water District  
6332 Zebulon Highway  
PO Box 3157  
Pikeville KY 41502-3157

11 Oct 2019

Invoice 16-2019-6

PSC Case	date	hours	cost
PSC's 2nd request for info	29 Jul 2019	04:45	\$712.50
looking at KRWA and Pikeville past rate studies	30 Jul 2019	01:45	\$262.50
responses to PSC 2nd and Pikeville	05 Aug 2019	01:45	\$262.50
last edits on PSC 2nd and Pikeville	08 Aug 2019	01:30	\$225.00
calculating different rate scenarios per JH	26 Aug 2019	01:15	\$187.50
preparation for hearing	27 Aug 2019	02:00	\$300.00
preparation for hearing	02 Sep 2019	04:30	\$675.00
meeting with Dan and Jack; meeting notes thereafter	03 Sep 2019	06:15	\$937.50
preparation for PSC hearing	09 Sep 2019	06:00	\$900.00
travel to and attendance at rate hearing	11 Sep 2019	09:00	\$1,350.00
travel to and pre-conference session at Jack's	10 Sep 2019	03:30	\$525.00
support for Jack's brief	16 Sep 2019	07:15	\$1,087.50
support for Jack's brief	23 Sep 2019	03:45	\$562.50
review Osterloh's brief - notes for Jack	07 Oct 2019	06:15	\$937.50
support for Jack's brief	08 Oct 2019	02:30	\$375.00
reviewing Jack's draft	09 Oct 2019	01:30	\$225.00
final review Jack's draft	11 Oct 2019	00:15	\$37.50
<b>Total</b>		<b>63:45</b>	<b>\$9,562.50</b>

# Invoice

Mountain Water District  
6332 Zebulon Highway  
PO Box 3157  
Pikeville KY 41502-3157

29 Jul 2019

Invoice 16-2019-5

PSC Case	date	hours	cost
Review Dan Stratton's discovery questions; talk with Steve Seelye regarding same	19 Apr 2019	03:15	\$487.50
adding two questions re: hydraulics and Marion's Branch	22 Apr 2019	03:45	\$562.50
review PSC rate cases	23 Apr 2019	00:45	\$112.50
review Pikeville's 1st response	24 Jun 2019	06:00	\$900.00
review Pikeville response/MWD questions	25 Jun 2019	05:45	\$862.50
MWD request questions	26 Jun 2019	09:30	\$1,425.00
MWD request questions	27 Jun 2019	10:00	\$1,500.00
MWD request questions	28 Jun 2019	04:30	\$675.00
MWD request questions	01 Jul 2019	01:00	\$150.00
review notes for testimony	08 Jul 2019	04:00	\$600.00
CLA testimony	15 Jul 2019	10:30	\$1,575.00
CLA testimony	16 Jul 2019	09:00	\$1,350.00
CLA testimony	17 Jul 2019	09:30	\$1,425.00
CLA testimony	18 Jul 2019	04:15	\$637.50
Total		81:45	\$12,262.50

**STRATTON LAW FIRM, P.S.C.**

111 Pike St., P.O. Box 1530  
Pikeville, KY 41502  
(606-437-7888)

Fax (606-437-7869)

# STATEMENT

**PRIVILEGED & CONFIDENTIAL**

Federal ID No. 31-1556382

Mountain Water District  
P.O. Box 3157  
Pikeville, KY 41502

ATTN: ROY SAWYERS

Account No. HEM3005-193

Statement Date: 07/31/2019  
Statement No. 20  
Page No. 1

RE: City of Pikeville - City Water Rates

**Fees**

			Hours
07/01/2019	DPS	Call from Jack; Receipt and review of PSC's follow-up question to City	0.25
	DPS	Call to Roy; Call to Mike Spears; Email and call from Jack Hughes re: PSC DR 2 to City and DR 2 to MWD	0.75
	DPS	Review emails from Answers to PSC questions to MWD	0.50
07/02/2019	DPS	E-mail received from and to Connie and Jack	0.25
	DPS	Work on Response to PSC; REview all letters and emails with City	1.00
	DPS	1st draft of Response to PSC	0.50
	DPS	Receipt and review of email from Connie & Jack re: her testimony	0.25
	DPS	Second draft of Response; Review all exhibits	0.50
	DPS	Letter to Jack, Roy and Connie with Response for their review	0.25
07/03/2019	DPS	Call from Roy; Email from and to Jack Hughes re: 1st draft of our Response to PSC	0.25
	DPS	Meet with Roy to review Response; Call to Jack	1.00
	DPS	Amend Response	0.25
07/08/2019	DPS	Receipt and review of various emails from Jack & Connie re: update	0.25
07/09/2019	DPS	Review final draft of PSC discovery Answers	0.50
07/10/2019	DPS	Receipt and review of email from Jack Hughes re: Connie's draft testimony; Receipt and review email from Connie	0.25
07/11/2019	DPS	Receipt and review of email from Jack re: Response to PSC; Reply email; Call to Jack	0.25

To ensure proper credit, please include account number and statement date on remittance checks. Thank you.

		Hours
	DPS Deliver package of discovery documents to UPS Store for overnight delivery to Frankfort, KY	0.25
	DPS Prepare 10 notebooks to send out to counsel for filing with the PSC	2.00
07/12/2019	DPS E-mail sent to Roy and Jack K.; Reply email from Jack	0.25
07/15/2019	DPS Multiple calls & emails with Jack to download response to PSC	0.50
	DPS Initial review of City's Response to PSC Discovery; Email to Jack	0.75
	DPS Print & review City's Response to PSC second data request	0.50
	DPS Review City's discovery Response and outline issue for Jack & Connie	1.50
	DPS Receipt and review of email from Jack re: Motion to Compel; Call to Mike and Roy; Email to Jack	0.25
07/16/2019	DPS Call from Roy re: confidentiality letter	0.25
	DPS E-mail received from Connie and Jack	0.25
07/17/2019	DPS E-mail sent to and from Tammy Olsen; Email to Jack & Connie re: purchased water	0.25
	DPS 1st draft memo to Jack & Connie re: Discovery issues	1.25
	DPS Call to Mike Blackburn; Call to Jack Hughes; Text to Mike	0.25
	DPS Revise memo to Jack	0.50
	DPS Receipt and review of email from Jack; Call from Roy	0.25
	DPS E-mail received from John Hughes and from Connie Allen with her comments to memo with remarks/edits to her written testimony	0.25
07/18/2019	DPS Two calls to Jack; Call to Mike B. re: discovery	0.50
	DPS Review Connie's testimony; Updated version; Call to Connie with comments	1.00
	DPS Call from Roy re: update	0.25
	DPS Receipt and review of Connie's analysis; Exchange of multiple emails with Jack and Connie	0.75
	DPS Call to Jack re: Connie's testimony	0.25
	DPS Proof Connie's final draft of her testimony; Email to Connie and Jack	0.50
	DPS Receipt and review of email from Jack & PSC re: notification of my name and address being added to notification list	0.25

		Hours
	DPS Receipt and review of email from Roy re: City map of distribution point	0.25
	DPS Receipt and review from Jack Hughes, Motion to Compel and cover letter to file electronically. Filed electronically with the PSC, Motion to Compel.	0.50
07/19/2019	DPS Receipt and review of revised testimony for Connie from Jack	0.25
	DPS E-mail received from Mike Blackburn; Letter to Rusty Davis	0.25
07/22/2019	DPS Receipt and review of emails from Connie & Jack; Reply emails re: schedule	0.25
	DPS Receipt and review from Jack Hughes, Connie's testimony to file in the PSC matter. R/R email from Connie with corrections. Corrections to Connie's testimony.	0.50
07/23/2019	DPS Various emails between John & Connie regarding available PSC hearing dates in August and September.	0.50
07/24/2019	DPS Receipt and review various emails from Jack and Connie regarding available dates to incorporate into the motion to continue hearing. T/C from Jack. R/R cover letter from Jack with go ahead to file after making corrections per Connie. Corrections to motion. Several attempts to file. Filed Motion to Reschedule Hearing.	0.75
	DPS Email with Notice to Continue Trial from Johnny; Edit Motion; Reply email	0.50
07/26/2019	DPS Receipt and review of various emails to and from Jack	0.25
	DPS Receipt and review City's Response to Motion to Compel. R/R City's Response to Motion to Reschedule. R/R PSC's Second Data Request to MWD. R/R PSC's Third Data Request to City of Pikeville.	0.75
07/29/2019	DPS Receipt and review of email from Jack; Review Confidentiality Agreement; Email to Roy	0.50
	DPS Receipt and review of City's filing; Email to and from Jack	0.25
07/30/2019	DPS Review rate study issue; Email to Roy and Tammy	0.50
	DPS Receipt and review of review emails from PSC, Jack and Connie re: rescheduling hearing at PSC	0.25
	DPS Receipt and review email from PSC, set up 3:00 pm conference call; Reply email	0.25
	DPS Meet with Roy re: Answers to PSC DR; Email to and from Jack Hughes	0.25
	DPS Attend Conference call with PSC; Call to Jack to schedule prep. dates; Call to Roy with hearing date	0.25
07/31/2019	DPS E-mail received from and to Roy re: hearing date	0.25

Mountain Water District

Statement Date: 07/31/2019  
Statement No. 20  
Account No. HEM300

	Hours	
DPS Receipt and review Order setting hearing; Email from Jack	0.25	
DPS Receipt and review of PSC filing of UMG's bills for City; Email to Jack and Roy	0.50	
For Current Services Rendered	<u>27.75</u>	<u>4,578.75</u>

Expenses

07/11/2019	Paid to United Parcel Service, overnight delivery fee	79.58
	Total Expenses	<u>79.58</u>
	Previous Balance	\$1,938.75
	Total Current Work	4,658.33

Payments

Total Payments	-1,938.75
Balance Due	<u>\$4,658.33</u>

**MAKE CHECK PAYABLE TO STRATTON LAW FIRM, PSC  
PAYMENT DUE UPON RECEIPT  
NOW ACCEPTING MASTERCARD, VISA AND DISCOVER  
THANK YOU**

**STRATTON LAW FIRM, P.S.C.**

111 Pike St., P.O. Box 1530  
Pikeville, KY 41502  
606-417-7800

Fax 606-417-7569

# STATEMENT

**PRIVILEGED & CONFIDENTIAL**

Federal ID No. 31-1556382

Mountain Water District  
P.O. Box 3157  
Pikeville, KY 41502

ATTN: ROY SAWYERS

Account No. HEM3005-193

Statement Date: 08/31/2019

Statement No. 21

RE: City of Pikeville - City Water Rates

Page No. 1

### Fees

			Hours
08/01/2019	DPS	E-mail sent to and from Jack re: discovery issue	0.25
	DPS	E-mail sent to board re: confidentiality agreement	0.25
	DPS	Work on Response to City's 1st DR to MWD; Call to Tammy; Call from Tammy	0.50
	DPS	E-mail received from Jack, forward email to Carrie re: billing from the City	0.25
	DPS	Work on Answers to Pikeville DR; Email and calls with Tammy	1.00
08/02/2019	DPS	Work on requests DR for City and PSC; Emails to Jack and Connie; Call to Tammy	1.00
	DPS	Receipt and review of Jack's bills, add to the DR Response	0.25
08/05/2019	DPS	Review Connie's draft Answers; Emails with Jack & Connie	0.50
	DPS	Review pleadings; Call & letter to David Taylor	0.50
	DPS	Receipt and review of water lines information; Email to Tammy	0.25
08/06/2019	DPS	E-mail sent to John and Connie, attaching drawing (map) done by David Taylor for their review prior to hone conference	0.25
	DPS	Prepared for meeting with David Taylor; Conference call with Connie & Jack	0.25
	DPS	Conference with Jack, Connie and David Taylor re: analysis of City & MWD joint lines	1.00
08/07/2019	DPS	Receipt and review of email from Connie and Jack re: revised Answers	0.25
08/08/2019	DPS	Responses to PSC's Second Data Request and City of Pikeville's First Data Request	4.00
08/09/2019	DPS	Finalizing Responses to PSC and City of Pikeville's data requests; Preparing	

To ensure proper credit, please include account number and statement date on remittance checks. Thank you.



Mountain Water District

Statement Date: 08/31/2019  
Statement No. 21  
Account No. HEM300

		Hours	
	notebooks, tabs, exhibits, etc.	3.00	
	DPS Work on on DR to City and PSC	0.50	
	DPS Review and edit final draft of PSC and City's DR Response	0.75	
	DPS Draft letter to Jack and Connie	0.25	
	DPS Two calls to Jack H. to clarify Excel Spreadsheet issue to PSC	0.25	
08/12/2019	DPS Various emails from/to John Hughes regarding the filing of MWD discovery Answers today; Prepared Supplemental Response to PSC 2nd Data Request Q3(b) to attached Excel spreadsheet; Prepared cover letter to file with Supplemental Response	1.00	
	DPS Receipt and review of (2) emails from Jack & Connie	0.25	
	DPS Amend Answers to DR per Jack's instructions	0.25	
	DPS Call from Jack re: revised Answer to PSC DR	0.25	
08/13/2019	DPS Various emails from/to John Hughes in that he received the hard copy notebooks to file with the PSC	0.50	
08/14/2019	DPS Receipt and review additional filings from Pikeville	0.25	
	DPS Receipt and review of several emails from Jack Hughes and Roy re: confidentiality agreement	0.50	
08/15/2019	DPS Meet with Roy to sign confidentiality agreement; Email to Jack Hughes	0.25	
	DPS Receipt and review of various emails from Jack and Connie re: confidentiality agreement	0.25	
	DPS Meet with Roy re: update	0.25	
08/16/2019	DPS Receipt and review of city updated filings	0.25	
08/20/2019	DPS Call to Jack Hughes re: meeting schedule for trial preparation; Receipt and review of email from Jack; Email to Roy	0.50	
08/21/2019	DPS E-mail sent to and from Connie Allen re: trial prep	0.25	
	DPS Receipt and review of emails from Roy, Jack and Connie	0.25	
08/23/2019	DPS Receipt and review of pleadings from City	0.25	
08/27/2019	DPS E-mail sent to Connie H. re: trial preparation	0.25	
	For Current Services Rendered	20.75	3,423.75
	Previous Balance		\$4,658.33

Mountain Water District

Statement Date: 08/31/2019  
Statement No. 21  
Account No. HEM300

Total Current Work 3,423.75

Balance Due \$8,082.08

**MAKE CHECK PAYABLE TO STRATTON LAW FIRM, PSC  
PAYMENT DUE UPON RECEIPT  
NOW ACCEPTING MASTERCARD, VISA AND DISCOVER  
THANK YOU**

STRATTON LAW FIRM, P.S.C.

111 Pike St., P.O. Box 1530  
Pikeville, KY 41502  
606-437-7800

Fax 606-437-7569

# STATEMENT

**PRIVILEGED & CONFIDENTIAL**

Federal ID No. 31-1556382

Mountain Water District  
P.O. Box 3157  
Pikeville, KY 41502

ATTN: ROY SAWYERS

Account No. HEM3005-193

Statement Date: 09/30/2019  
Statement No. 22  
Page No. 1

RE: City of Pikeville - City Water Rates

### Fees

			Hours
09/02/2019	DPS	Outline issues for Connie Allen's and Roy Sawyers trial preparation	3.00
09/03/2019	DPS	Travel to and from Harrodsburg, KY; Meet with Connie for trial preparation	6.00
	DPS	Receipt and review of PSC Order on Motion to Compel; Call and email to Roy - schedule for trial preparation	0.50
	DPS	Receipt and review MWD's witness & exhibit list filed by John Hughes, Esq.; Receipt and review City's Notice of Implementation of Rates and City's Witness and Exhibit list filed by M. Todd Osterloah, Esq., PSC Order denying MWD's Motion to Compel UMG Financial's	0.50
09/04/2019	DPS	Review of approximately 3,000 pages of discovery, printed all questions and answers for Roy to review for the PSC hearing next week (386 pages)	2.00
	DPS	Multiple emails to and from Jack Hughes and Connie	0.25
09/06/2019	DPS	Receipt and review of various emails from Jack and Connie	0.25
09/09/2019	DPS	Receipt and review of email from Jack re: Roy's cross-examination	0.25
09/10/2019	DPS	Receipt and review of email from Todd O. re: PSC filing	0.25
	DPS	Review Roy's testimony; Work on cross-examination for Roy; Work on cross-examination for Molly	2.00
	DPS	Travel from Lexington to Frankfort; Meet with Jack, Roy and Connie for trial preparation; Return trip from Frankfort to Lexington	3.00
09/11/2019	DPS	Attend hearing in Frankfort before PSC; Travel fro Lexington to Frankfort and Frankfort to Pikeville	9.50
	DPS	First draft of memo to board re: hearing	0.25
	DPS	Memo to Jack H. and Roy re: items will need to provide PSC	0.25

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Mountain Water District

Statement Date: 09/30/2019  
 Statement No. 22  
 Account No. HEM300

			Hours	
09/12/2019	DPS	Receipt and review Order from 9/11/19 PSC hearing	0.25	
	DPS	Second draft of memo to board; Call to Jack Hughes	0.50	
09/13/2019	DPS	Receipt and review various pleadings filed with the PSC from 9/10/19 to 9/13/19; Total of (14) fourteen documents	0.50	
	DPS	Various emails from Jack & Connie re: Marion's Branch Water Tank	0.25	
09/16/2019	DPS	Various email to Connie, Jack and Roy re: conference call	0.25	
	DPS	Conference with Jack & Connie; Receipt and review of (2) email from Connie	0.75	
	DPS	Call to Tammy and Roy re: additional information	0.25	
09/17/2019	DPS	Receipt and review email from Jack; Reply email re: post hearing DR	0.25	
09/20/2019	DPS	Receipt and review of various PSC filings; Email from Connie & Jack	0.25	
09/23/2019	DPS	Receipt and review of email with exhibits from Connie	0.25	
	DPS	Receipt and review multiple emails for Jack and Connie	0.25	
09/24/2019	DPS	Meet with Roy; Call to Connie re: Connie's questions to Roy	0.50	
09/25/2019	DPS	Receipt and review of transcript of hearing; Email to Jack; Reply email	0.50	
09/30/2019	DPS	Receipt and review of email from Connie re: revised tax and chart of inch/mile ratio	0.25	
	DPS	Receipt and review of new chart of cost adjustments	0.25	
		For Current Services Rendered	33.25	5,486.25

Expenses

09/03/2019		Paid to Dan Stratton, reimbursement of mileage, travel to Harrodsburg, KY return back to Lexington, KY		51.04
09/04/2019		In Office Copies of discovery 386 pages @ .10 per page		38.60
09/10/2019		Paid to Dan Stratton, reimbursement of mileage, travel from Lexington, KY to Frankfort, KY and back to Lexington		117.74
09/11/2019		Paid to Dan Stratton, reimbursement of mileage, travel to Frankfort, KY from Lexington, KY - from Frankfort back to Lexington		117.74
		Total Expenses		325.12
		Previous Balance		8,082.08
		Total Current Work		5,811.37

Payments

		Total Payments		-8,082.08
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Mountain Water District

Statement Date: 09/30/2019  
Statement No. 22  
Account No. HEM300

Balance Due

\$5,811.37

**MAKE CHECK PAYABLE TO STRATTON LAW FIRM, PSC  
PAYMENT DUE UPON RECEIPT  
NOW ACCEPTING MASTERCARD, VISA AND DISCOVER  
THANK YOU**

**STRATTON LAW FIRM, P.S.C.**

111 Pike St., P.O. Box 1530  
Pikeville, KY 41502  
606-437-7800

Fax: 606-437-7369

# STATEMENT

**PRIVILEGED & CONFIDENTIAL**

Federal ID No. 31-1556382

Mountain Water District  
P.O. Box 3157  
Pikeville, KY 41502

ATTN: ROY SAWYERS

Account No. HEM3005-193

Statement Date: 10/25/2019

Statement No. 23

Page No. 1

RE: City of Pikeville - City Water Rates

Fees

			Hours	
10/02/2019	DPS	Review 1st draft of Jack's Brief - outline questions and recommendations	1.50	
	DPS	Conference call with Jack Hughes to review Brief	0.50	
10/04/2019	DPS	Receipt and review of City's post hearing Brief; Email from and to Jack	0.50	
	DPS	Review pleadings; Letter to Jack	0.75	
10/05/2019	DPS	Work on edit's to Brief	1.50	
10/07/2019	DPS	Draft letter to Jack re: edits to Brief and comments on City's Brief	0.50	
	DPS	Work on Brief; Revise Jack's; Second draft, incorporated Response to City's Brief	1.75	
10/08/2019	DPS	Call to Jack Hamilton; Send Jack revised Brief	0.25	
	DPS	Receipt and review multiple emails with Jack and Connie re: Brief issues	0.25	
10/09/2019	DPS	Receipt and review email from Jack Hughes with two (2) Post Hearing Briefs, one working, one clean; Various emails to and from Jack/Connie regarding Brief	0.50	
	DPS	Review revised Brief; Call to Jack with comments	0.50	
		For Current Services Rendered	8.50	1,402.50
		Previous Balance		\$5,811.37
		Total Current Work		1,402.50
		Balance Due		\$7,213.87

To ensure proper credit, please include account number and statement date on remittance checks. Thank you.

## STATEMENT OF ACCOUNT

John N. Hughes, PSC  
 Attorney at Law  
 124 West Todd St.  
 Frankfort, KY 40601

Invoice to:  
 Mountain Water District  
 % Roy Sawyers  
 6332 Zebulon Hwy ~ PO Box 3157  
 Pikeville, KY 41501

Date of Invoice: October 18, 2019

Date	Reference	Time (Hrs)
8/1	Several messages DS re: rate case issues	.33
8/5	Review CA draft responses PSC DR 2	.5
8/6	Conference call DS, CA re: PSC DR 2	.75
8/9	Review/revise PSC DR 2; Pikeville DR 1	.75
8/13	Review Pikeville DR 3	1
8/14	Review Pikeville DR 1 responses	.5
8/16	Review Pikeville Supp DR	.25
8/22	Tele. DS re: case issues	.25
8/23	Review Pikeville Supp DR	.25
8/26	Review info from CA for hearing prep	.5
8/27	Hearing prep	3.5
8/30	Prepare hearing witness and exhibit list	.5
9/2	Prep for witness conference	3.5
9/3	CA witness prep	6.75
	Mileage Harrodsburg <u>50@\$.50</u>	\$25.00
9/4	Hearing prep	5
9/9	Hearing prep	4.5
9/10	Witness prep; review Pikeville corrected exhibits	2.5
9/11	PSC hearing	6.5
9/16	Tele. DS, CA hearing issues; several messages re: brief issues; Marion' Br. documents	3.75
9/17	Prepare/file PHDR	.5
9/23	Several messages CA re: brief issues	.75
9/27	Messages CA, DS re: brief issues; draft brief	6.5
9/28	Messages CA, DS re: brief issues; draft brief	7.5
9/29	Review Hearing video	4.5

9/30	Messages CA, DS re: brief issues; draft brief	6.5
10/1	Draft brief	7.5
10/2	Brief	2
10/4	Review Pikeville brief	1.5
10/7	Messages CA re: brief issues	.5
10/8	Messages Ca re: brief revisions	.75
10/10	Brief revisions	2.5
10/14	Final brief revisions	1
Sub total		83.58 hr. @ \$350.00 = \$29,253.00
Expenses		\$25.00
Previous balance		\$ 0
	<b>Total Due this invoice:</b>	<b>\$29,278.00</b>