

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**PIKEVILLE’S FIRST SET OF REQUESTS FOR INFORMATION
TO MOUNTAIN WATER DISTRICT**

In accordance with the Public Service Commission’s (“Commission”) June 10, 2019 Order, the City of Pikeville propounds the following data requests upon the Mountain Water District. MWD shall respond to these requests in accordance with the provisions of the Commission’s Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate Pikeville’s request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for Pikeville.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
5. To the extent that the specific document, workpaper, or information does not exist

as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

7. If MWD objects to any request on any grounds, please notify counsel for Pikeville as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

10. These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

Respectfully submitted,



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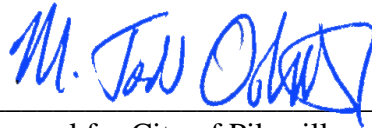
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Attorneys for City of Pikeville

CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8(7), this is to certify that the City of Pikeville's July 29, 2019, electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on July 29, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and a copy of the filing are being delivered to the Commission within two (2) business days.



Counsel for City of Pikeville.

REQUESTS FOR INFORMATION

1. Please refer to the testimony of Connie L. Allen at page 4, on which she states, “Mr. Petty could have achieved a level of functionalization using information in the general ledger to categorize the expenses” Please confirm that Ms. Allen did not use information from Pikeville’s general ledger to functionalize Pikeville’s expenses.
2. Please refer to the testimony of Connie L. Allen at line 26 on page 8 to line 2 on page 9, on which she states that “all of the debt was not even relevant to the water system.” State whether Ms. Allen is asserting that none of the debt associated with the bond ordinances was related to Pikeville’s water system.
3. Please refer to the testimony of Connie L. Allen at page 12, lines 23-24. Please explain what line items do not correlate between the general ledger and the items Mr. Petty lists in Figure 3 of his cost-of-service study.
4. Please refer to the testimony of Connie L. Allen at page 17, on which she states that she calculated a 40-percent factor when calculating the inch-mile ratio for MWD. Please demonstrate how Ms. Allen arrived at that conclusion.
5. Please refer to the testimony of Connie L. Allen at page 23, Q43. Explain how Ms. Allen calculated her understanding that 69 percent of the expense related to the UMG contract has been allocated to MWD based on Pikeville’s cost-of-service study.
6. Confirm that MWD does not have offer a separate rate for industrial customers, as compared to residential customers.
7. Confirm that in June 2019 Mountain Water District experienced high turbidity at its water treatment plant due to rain, causing Mountain Water District to purchase additional amounts of water to ensure service was not interrupted to the Water District’s customers.

8. Identify MWD's unaccounted-for water loss by month for every month since and including July 1, 2016.
9. Identify the number of customers served by MWD as of:
 - a. June 30, 2019
 - b. June 30, 2017
10. For every month since and including July 1, 2016, identify the volume of water that MWD purchased from each of its wholesale suppliers and the volume of water MWD produced at its water treatment plant.
11. For every month since and including July 1, 2016, identify the volume of water sold by MWD to each of its wholesale customers.