

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE)	
WATER SERVICE RATES OF PRINCETON WATER)	Case No. 2019-00444
AND WASTEWATER COMMISSION)	

**PWWC’S FIRST SET OF REQUESTS FOR INFORMATION TO CALDWELL
COUNTY WATER DISTRICT AND LYON COUNTY WATER DISTRICT**

Princeton Water and Wastewater Commission (“PWWC”), by counsel, propounds the following data requests upon the Caldwell County Water District and Lyon County Water District. The Water Districts are requested 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 PWWC’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 PWWC.
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 the Water Districts object to any request on any grounds, please notify counsel for PWWC 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,



STURGILL, TURNER, BARKER & MOLONEY, PLLC

M. Todd Osterloh

James W. Gardner

333 W. Vine Street, Suite 1500

Lexington, Kentucky 40507

Telephone No.: (859) 255-8581

Facsimile No.: (859) 231-0851

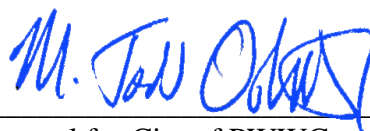
jgardner@sturgillturner.com

tosterloh@sturgillturner.com

Attorneys for PWWC

CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8(7), this is to certify that the April 5, 2020, 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 April 5, 2020; 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 will be filed with the Commission within 30 days after the lifting of the emergency, as discussed in Case No. 2020-00085.



Counsel for City of PWWC.

DATA REQUESTS TO CALDWELL COUNTY WATER DISTRICT
AND LYON COUNTY WATER DISTRICT

1. Provide all workpapers, assumptions, and analyses to support Mr. Vilines opinion that PWWC's total wholesale revenue requirement should be approximately \$569,900 and PWWC's wholesale rate should be \$2.59 per 100 cubic feet.

2. Please state whether Mr. Vilines is providing his testimony in his professional relationship with Kentucky Rural Water Association.

3. Provide a list of Public Service Commission rate cases in which Mr. Vilines has provided testimony.

4. Please refer to Mr. Vilines testimony at page 3, lines 1-2. List all Public Service Commission rate cases (not including Purchased Water Adjustments) for which Mr. Vilines has prepared a rate study, which resulted in an application for a rate increase filed with the Commission.

5. Please refer to Mr. Vilines testimony at page 3, lines 21-23. Please identify each and every "use" factor that Mr. Vilines utilized in his analysis to propose PWWC's wholesale revenue requirement, explain how each "use" factor was calculated, and identify where in the workpapers these calculations are presented.

6. Please refer to Mr. Vilines testimony at page 5, lines 16-20. Please state the effect (in dollars) on the impact of PWWC's revenue requirement, according to Mr. Vilines, based on his opinion that employee and family health insurance premiums "should have been adjusted consistent with the Bureau of Labor Statistics' national average for an employee's share of health insurance premiums."

7. Please refer to Mr. Vilines testimony at page 5, lines 22-23. Please state the effect (in dollars) of the on the impact of PWWC's revenue requirement, according to Mr. Vilines, based on his opinion that retirement liability expenses "should not be included as part of the revenue requirement."

8. Please refer to Mr. Vilines testimony beginning at page 5, lines 24, stating: "The allocation of expenses to the water and sewer divisions from the Administration and Maintenance groups should have been made using more rational and detailed methods." Explain what methods Mr. Vilines believes should have been used to allocate these expenses.

9. Please refer to Mr. Vilines testimony at page 6, lines 2-6. Please state whether Mr. Vilines separated PWWC's operation and maintenance, depreciation, and debt service expenses into water production, transmission and distribution, administration, and customer accounts categories. If yes, please provide a detailed narrative description of how Mr. Vilines determined what expenses would be separated in to each category, and please identify the specific workpapers in which this is performed.

10. Please refer to Mr. Vilines testimony at page 6, lines 6-9. In Mr. Vilines's opinion, what activities of the Administration and Maintenance groups are related solely to retail customers and facilities serving retail customers.

11. State how Mr. Vilines would recommend allocating maintenance salary expense between PWWC's water and sewer divisions.

12. Please refer to Mr. Vilines testimony at page 6, lines 15-17. Identify each and every PWWC expense (by description and dollar amount) that PWWC included in its determination of the revenue requirement and that Mr. Vilines believes should not be included in PWWC's wholesale revenue requirement.

13. Please provide a copy of the most recent testing report for each meter Caldwell County Water District and Lyon County Water District uses to receive service from PWWC.