

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

In the Matter of:

**ELECTRONIC EMERGENCY DOCKET)
RELATED TO THE NOVEL CORONAVIRUS) CASE NO. 2020-00085
COVID-19)**

**RESPONSE OF
Boone County Water District
TO
COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
DATED JUNE 23, 2020**

FILED: July 20, 2020

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8 and the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085 regarding electronic filings, I certify that Boone County Water District's Response to Commission Staff's Initial Request for Information was transmitted to the Public Service Commission by way of email on July 20, 2020 and Boone County Water District will file original paper copies of this filing within 30 days of the lifting of the State of Emergency.

A handwritten signature in cursive script, appearing to read "Harry Anness", written over a horizontal line.

Harry Anness, General Manager
Boone County Water District

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 1

Responding Witness: Harry Anness

Q-1. Provide the utility's current number of customers and the date used for that determination.

A-1. Current Number of Customers-26,933, Date of Determination-7-1-2020.

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 2

Responding Witness: Harry Anness

Q-2. If applicable, provide the utility's current number of customers per class.

A-2.

Residential	24,958
Commercial	1,509
Industrial	16
Multi-Unit	280
Public Authority	169
Resale	<u>1</u>
 Total Customers	 <u><u>26,933</u></u>

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 3

Responding Witness: Harry Anness

Q-3. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average total bill for all customers for:

- a. 2017 as a year, not each month;**
- b. 2018 as a year, not each month;**
- c. 2019 as a year, not each month; and**
- d. Each month in 2020.**

Total bill is defined as including charges for current service and past service that is unpaid, including the accumulation of fees.

A-3. (A) 2017 Average Total Bill \$45.52

(B) 2018 Average Total Bill \$46.25

(C) 2019 Average Total Bill \$49.30

(D) 2020 Each Month Total Average

January \$47.41

February \$45.41

March \$50.74

April \$41.50

May \$47.09

June \$46.76

2020 Average Total Bill \$46.49

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 4

Responding Witness: Harry Anness

Q-4. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average total bill for all customers in each class for:

- a. 2017 as a year, not each month;**
- b. 2018 as a year, not each month;**
- c. 2019 as a year, not each month; and**
- d. Each month in 2020.**

Total bill is defined as including charges for current service and past service that is unpaid, including the accumulation of fees.

A-4. See Attached Labeled A-4

Boone County Water District
PSC Case # 2020-00085 Item #4
Average Total Bill Including Unpaid Past Bills & Fees
By Class

A-4

September			#DIV/0!			#DIV/0!			#DIV/0!			#DIV/0!			#DIV/0!
October			#DIV/0!			#DIV/0!			#DIV/0!			#DIV/0!			#DIV/0!
November			#DIV/0!			#DIV/0!			#DIV/0!			#DIV/0!			#DIV/0!
December			#DIV/0!			#DIV/0!			#DIV/0!			#DIV/0!			#DIV/0!
2020 Totals	173,776	4,443,579.52		10,309	2,212,761.40		112	55,758.89		1,951	429,063.91		1,151	313,633.53	7 90,120.35
	Average Bill		25.57	Average Bill		214.64	Average Bill	497.85	Average Bill	219.92	Average Bill	272.49	Average Bill	12,874.34	

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 5

Responding Witness: Harry Anness

- Q-5. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average bill for current service for all customers for:**
- a. 2017 as a year, not each month;**
 - b. 2018 as a year, not each month;**
 - c. 2019 as a year, not each month; and**
 - d. Each month in 2020.**

A-5. See Attached Labeled A-5.

A-5

**Boone County Water District
PSC Case # 2020-00085 Item #5
Average Total Current Bill
All Customers**

2017	Total Number of Bills	Total Current Amount Billed	Average Bill
2017 Totals	307,523	13,513,589.91	
		2017 Average Bill	<u>43.94</u>

2018	Total Number of Bills	Total Current Amount Billed	Average Bill
2018 Totals	312,628	13,981,988.27	
		2018 Average Bill	<u>44.72</u>

2019	Total Number of Bills	Total Current Amount Billed	Average Bill
January	26,280	1,282,486.74	48.80
February	26,300	1,042,119.72	39.62
March	26,325	1,126,259.91	42.78
April	26,346	1,026,970.10	38.98
May	26,379	1,209,706.57	45.86

2020	Total Number of Bills	Total Current Amount Billed	Average Bill
January	26,666	1,220,197.10	45.76
February	26,639	1,178,252.45	44.23
March	26,675	1,214,394.88	45.53
April	26,724	1,041,236.97	38.96
May	26,786	1,189,894.52	44.42
June	26,876	1,169,411.19	43.51
July	26,933	1,399,406.32	51.96
August			#DIV/0!
September			#DIV/0!
October			#DIV/0!
November			#DIV/0!
December			#DIV/0!
2020 Totals	187,299	8,412,793.43	
		2020 Average Bill	<u>44.92</u>

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 6

Responding Witness: Harry Anness

Q-6. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average bill for current service for all customers in each class for:

- a. 2017 as a year, not each month;**
- b. 2018 as a year, not each month;**
- c. 2019 as a year, not each month; and**
- d. Each month in 2020.**

The differences between request 3 and request 5, and request 4 and request 6 should provide the average arrearage for all customers and for each class, respectively.

A-6. See Attached Labeled A-6.

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 7

Responding Witness: Harry Anness

Q-7. Explain how the utility calculates bad debt.

- a. Explain the decision criteria governing when the utility writes off bad debt.**
- b. Provide the monthly bad debt write-offs for each month in 2018, 2019 and 2020.**
- c. If the utility has changed its calculation or determination of bad debt in the past two years, explain its previous calculation or determination of bad debt and the reason for the change.**

A-7. (A) After Attempting to collect debt via Billing, Accounts are sent to collections. If payment is not received in 2 years amounts are written off as bad debt.

(B) Bad debt is written off in December.
2017 \$35,082.00
2018 \$26,048.00
2019 \$33,078.00
2020 \$0

(C) The decision criteria has not changed in the past 2 years.

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 8

Responding Witness: Harry Anness

Q-8. Assuming the Commission's moratorium on disconnections was not in effect, provide the number of customers in each class that would be subject to disconnection, and the date used for this determination.

A-8.

Date of Determination: 7/17/2020

Customer Class	Number of Customers That Would be Subject to Disconnection
Residential	947
Commercial	29
Industrial	
Multi-Unit	
Public Authority	
Resale	
Total	<u>976</u>

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 9

Responding Witness: Harry Anness

Q-9. Provide the percent of customers, by class, that pay on time for:

- a. 2017 as a year, not each month;**
- b. 2018 as a year, not each month;**
- c. 2019 as a year, not each month; and**
- d. Each month in 2020**

A-9. Percentage of customers that pay on time.

	Residential	Commercial	Industrial	Multi-Unit	Public Authority	Resale
2017	62%	89.00%	100%	97%	97%	100%
2018	63%	91%	100%	99%	98%	100%
2019	70%	91%	100%	94%	98%	100%
2020						
Jan	97%	99%	100%	100%	100%	100%
Feb	97%	99%	100%	100%	100%	100%
Mar	97%	99%	100%	100%	100%	100%
Apr	96%	98%	100%	100%	100%	100%
May	97.00%	98%	100%	100%	100%	100%
Jun	96%	99%	100%	100%	100%	100%
Jul	96%	98%	100%	100%	100%	100%
Aug						
Sep						
Oct						
Nov						
Dec						

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 10

Responding Witness: Harry Anness

Q-10. Provide the following information for January 1, 2015, until December 31, 2019. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Further, provide the following information by class.

- a. Provide monthly totals of service termination notices issued to customers only for nonpayment of bills.**
- b. Provide monthly totals of service terminations for customers only for non-payment of bills.**
- c. Provide the total number of customers for each month.**

This information should be provided so as not to duplicate customer counts. The information requested in this request should be presented similarly to the residential-only information provided in Case No. 2019-00366. For reference, refer to Louisville Gas and Electric Company and Kentucky Utilities Company's response to Post-Formal Conference Request for Information filed with the Commission on March 6, 2020.

A-10. See Attached Labeled A-10.

Boone County Water District
PSC Case # 2020-00085 Item # 10
Termination Notices & Terminations By Month
1/1/2015 through 12/31/2019

A-10

	Residential Customers			Commercial Customers			Industrial Customers			Multi-Unit Customers			Public Authority Customers			Resale Customers		
	Total No. of Customers	Total No. of Notices	Total Customers Disconnected	Total No. of Customers	Total No. of Notices	Total Customers Disconnected	Total No. of Customers	Total No. of Notices	Total Customers Disconnected	Total No. of Customers	Total No. of Notices	Total Customers Disconnected	Total No. of Customers	Total No. of Notices	Total Customers Disconnected	Total No. of Customers	Total No. of Notices	Total Customers Disconnected
	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected
2015	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
January																		
February																		
March																		
April																		
May																		
June																		
July																		
August																		
September																		
October																		
November																		
December																		
2015 Totals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2016	282,159	9,178	1,808	16,459	128	28	192	0	0	2,941	8	0	1,862	2	0	12	0	0
January	23,340	904	192	1,316	12	3	16	0	0	241	0	0	154	0	0	1	0	0
February	23,378	541	133	1,328	8	1	16	0	0	241	0	0	154	0	0	1	0	0
March	23,429	781	154	1,329	8	0	16	0	0	244	0	0	154	0	0	1	0	0
April	23,455	645	128	1,363	14	3	16	0	0	244	0	0	158	0	0	1	0	0
May	23,475	799	155	1,387	10	1	16	0	0	245	0	0	156	0	0	1	0	0
June	23,510	413	149	1,401	6	1	16	0	0	245	1	0	156	0	0	1	0	0
July	23,533	904	125	1,421	8	2	16	0	0	248	0	0	157	2	0	1	0	0
August	23,571	499	145	1,401	4	1	16	0	0	248	0	0	156	0	0	1	0	0
September	23,588	928	101	1,419	21	4	16	0	0	248	0	0	155	0	0	1	0	0
October	23,611	911	198	1,376	8	0	16	0	0	247	0	0	155	0	0	1	0	0
November	23,628	934	179	1,363	18	6	16	0	0	245	0	0	154	0	0	1	0	0
December	23,641	919	149	1,355	11	6	16	0	0	245	7	0	153	0	0	1	0	0
2016 Totals	282,159	9,178	1,808	16,459	128	28	192	0	0	2,941	8	0	1,862	2	0	12	0	0
2017	23,747	798	128	1,223	10	0	16	0	0	266	1	0	154	0	0	1	0	0
January	23,747	798	128	1,223	10	0	16	0	0	266	1	0	154	0	0	1	0	0
February	23,708	744	115	1,233	13	0	16	0	0	267	0	0	154	1	0	1	0	0
March	23,748	774	161	1,273	16	0	16	0	0	268	4	4	154	0	0	1	0	0
April	23,746	735	116	1,302	12	0	16	0	0	269	0	0	155	0	0	1	0	0
May	23,747	697	160	1,353	11	1	16	0	0	272	0	0	155	2	0	1	0	0
June	23,740	610	88	1,435	14	1	16	0	0	273	4	0	158	0	0	1	0	0
July	23,773	839	137	1,463	9	0	16	0	0	273	0	0	157	0	0	1	0	0
August	23,803	767	153	1,470	12	2	16	0	0	273	0	0	158	1	0	1	0	0
September	23,843	877	118	1,485	11	2	16	0	0	273	0	0	156	1	0	1	0	0
October	23,867	823	140	1,474	17	4	16	0	0	273	0	0	157	0	0	1	0	0

Boone County Water District
PSC Case # 2020-00085 Item # 10
Termination Notices & Terminations By Month
1/1/2015 through 12/31/2019

A-10

	Total No. of Customers	Total No. of Disconnect Notices	Total Customers Disconnected	Total No. of Customers	Total No. of Disconnect Notices	Total Customers Disconnected	Total No. of Customers	Total No. of Disconnect Notices	Total Customers Disconnected	Total No. of Customers	Total No. of Disconnect Notices	Total Customers Disconnected	Total No. of Customers	Total No. of Disconnect Notices	Total Customers Disconnected	Total No. of Customers	Total No. of Disconnect Notices	Total Customers Disconnected
November	23,881	781	166	1,492	21	7	16	0	0	273	0	0	158	0	0	1	0	0
December	23,898	777	0	1,502	20	0	16	0	0	273	0	0	156	0	0	1	0	0
2017 Totals	285,501	9,223	1,482	16,705	166	17	192	0	0	3,253	9	4	1,872	5	0	12	0	0
Residential Customers Commercial Customers Industrial Customers Multi-Unit Customers Public Authority Customers Resale Customers																		
2018	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected
January	23,916	937	217	1,471	16	2	16	0	0	271	0	0	156	0	0	1	0	0
February	23,956	559	63	1,455	6	0	16	0	0	271	1	0	158	0	0	1	0	0
March	23,988	638	104	1,447	12	0	16	0	0	271	0	0	157	1	1	1	0	0
April	23,998	700	126	1,450	19	2	16	0	0	271	0	0	156	0	0	1	0	0
May	24,074	649	205	1,446	11	0	16	0	0	271	0	0	156	0	0	1	0	0
June	24,130	787	0	1,440	8	0	16	0	0	273	0	0	157	0	0	1	0	0
July	24,169	681	157	1,467	12	1	16	0	0	273	0	0	156	0	0	1	0	0
August	24,205	840	179	1,470	13	1	16	0	0	274	1	0	157	0	0	1	0	0
September	24,250	778	136	1,490	4	1	16	0	0	274	0	0	159	2	0	1	0	0
October	24,277	956	189	1,500	10	3	16	0	0	274	0	0	160	0	0	1	0	0
November	24,300	724	120	1,533	13	1	16	0	0	276	1	0	160	0	0	1	0	0
December	24,322	794	182	1,510	12	9	16	0	0	280	1	0	160	1	0	1	0	0
2018 Totals	289,586	9,043	1,678	17,679	136	20	192	0	0	3,279	4	0	1,892	4	1	12	0	0
Residential Customers Commercial Customers Industrial Customers Multi-Unit Customers Public Authority Customers Resale Customers																		
2019	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected	Customers	Notices	Disconnected
January	24,364	599	158	1,464	14	3	16	0	0	278	0	0	158	1	0	1	0	0
February	24,374	745	101	1,473	11	0	16	0	0	278	17	0	159	1	0	1	0	0
March	24,404	586	82	1,469	5	1	16	0	0	278	0	0	158	0	0	1	0	0
April	24,430	674	124	1,464	11	0	16	0	0	278	0	0	158	0	0	1	0	0
May	24,467	311	169	1,456	6	2	16	0	0	281	0	0	159	1	0	1	0	0
June	24,514	543	152	1,490	19	2	16	0	0	281	0	0	160	0	0	1	0	0
July	24,564	375	134	1,487	11	1	16	0	0	281	1	0	162	0	0	1	0	0
August	24,577	774	231	1,492	7	1	16	0	0	281	0	0	161	0	0	1	0	0
September	24,587	624	171	1,530	10	4	16	0	0	281	0	0	163	0	0	1	0	0
October	24,623	786	167	1,544	16	1	16	0	0	281	0	0	163	0	0	1	0	0
November	24,643	751	173	1,575	8	4	16	0	0	281	0	0	164	0	0	1	0	0
December	24,677	716	244	1,519	17	0	16	0	0	280	0	0	163	0	0	1	0	0
2019 Totals	294,224	7,484	1,906	17,963	135	19	192	0	0	3,359	18	0	1,928	3	0	12	0	0

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 11

Responding Witness: Harry Anness

Q-11. Provide the total income received from late payment fees for:

- a. Each month in 2017;**
- b. Each month in 2018;**
- c. Each month in 2019; and**
- d. Each month in 2020**

A-11. See Attached Labeled A-11.

A-11

Boone County Water District
PSC Case # 2020-00085 Item # 11
Total Income From Late Fees by Month

<u>2017</u>	<u>Income From Late Fees</u>	<u>2019</u>	<u>Income From Late Fees</u>
January	14,527.65	January	18,563.11
February	15,996.50	February	14,432.12
March	14,167.44	March	13,153.66
April	11,969.18	April	12,478.37
May	13,033.36	May	28,452.82
June	15,772.44	June	22,241.86
July	16,175.12	July	18,392.71
August	21,106.82	August	17,119.23
September	17,209.33	September	18,725.03
October	16,766.63	October	30,333.70
November	17,511.82	November	17,611.41
December	16,224.73	December	28,283.81
2017 Totals	<u><u>190,461.02</u></u>	2019 Totals	<u><u>239,787.83</u></u>

<u>2018</u>	<u>Income From Late Fees</u>	<u>2020</u>	<u>Income From Late Fees</u>
January	13,362.92	January	24,673.71
February	14,729.02	February	22,351.00
March	15,704.86	March	20,416.67
April	12,159.23	April	20,416.67
May	15,723.43	May	20,416.67
June	14,961.13	June	20,416.67
July	16,353.04	July	22,076.22
August	25,648.90	August	
September	22,556.22	September	
October	18,892.11	October	
November	29,438.45	November	
December	14,645.28	December	
2018 Totals	<u><u>214,174.59</u></u>	2020 Totals	<u><u>150,767.61</u></u>

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 12

Responding Witness: Harry Anness

Q-12. Quantify the amount of late payment fees the utility would have assessed since March 16, 2020, absent the Commission's directive.

A-12.

<u>2020</u>	<u>Late Fees the District Would Have Assessed</u>
March	20,416.67
April	20,416.67
May	20,416.67
June	20,416.67
July	22,076.22
August	
September	
October	
November	
December	
2020 Totals	<u><u>103,742.90</u></u>

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 13

Responding Witness: Harry Anness

Q-13. Provide copies of all general communication provided to customers regarding arrearages, late payments, payment plans, etc. since March 16, 2020. Customer-specific communication is excluded from this request.

A-13.

General Communications to Customers about Arrearages, Late Payment, and Payment Plans

Bills sent, Disconnect Notices, Phone, In person,
Website

E-Bills & Text messages for our customer who have chosen these services.

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 14

Responding Witness: Harry Anness

Q-14. Provide a detailed explanation and breakout of any cost increases and decreased income (by customer class if applicable) the utility has experienced as a result of the COVID-19 State of Emergency.

A-14. \$1,100.00 in additional costs for PPE. Decreased income from fee's see answer 12.

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 15

Responding Witness: Harry Anness

Q-15. Provide a detailed explanation and breakout of any cost decreases and increased income the utility has experienced as a result of the COVID-19 State of Emergency.

A-15. N/A

Boone County Water District

CASE NO. 2020-00085

Response to Commission Staff's Initial Request for Information

Question No. 16

Responding Witness: Harry Anness

Q-16. Provide any additional information or data the utility believes the Commission should consider in amending or vacating its previous Orders in this matter.

A-16. N/A