

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

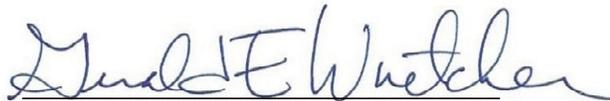
ELECTRONIC EMERGENCY DOCKET)
RELATED TO THE NOVEL CORONAVIRUS) CASE NO. 2020-00085
COVID-19)

**RESPONSE OF HYDEN-LESLIE COUNTY WATER DISTRICT
TO COMMISSION STAFF’S INITIAL REQUEST FOR INFORMATION**

Hyden-Leslie County Water District submits its Response to Commission Staff’s Initial Request for Information.

Dated: July 23, 2020

Respectfully submitted,

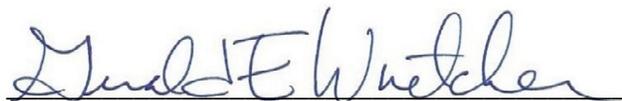


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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Hyden-Leslie County Water District’s electronic filing of this Response is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Public Service Commission on July 23, 2020; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that within 30 days following the end of the state of emergency announced in Executive Order 2020-215 this Response in paper medium will be delivered to the Public Service Commission.



Counsel for Hyden-Leslie County Water District

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC EMERGENCY DOCKET)
RELATED TO THE NOVEL CORONAVIRUS) CASE NO. 2020-00085
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RESPONSE OF
HYDEN-LESLIE COUNTY WATER DISTRICT
TO
COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION

FILED: July 23, 2020

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
Case No. 2020-00085**

Question No. 1

Responding Witness: L.J. Turner

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

A-1. As of July 3, 2020, Hyden-Leslie County Water District had 3,705 active accounts.

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
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Question No. 2

Responding Witness: L.J. Turner

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

A-2. As of July 3, 2020, Hyden-Leslie County Water District had 3,705 active accounts. These accounts are classified as follows:

Residential – 3,436

Commercial – 169

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
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Question No. 3

Responding Witness: L.J. Turner

- 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. \$56.67
 - b. \$59.80
 - c. \$56.99
 - d. January 2020 – \$50.74
February 2020 – \$52.25
March 2020 – \$51.44
April 2020 – \$52.22
May 2020 – \$52.63
June 2020 – \$54.21

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
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Question No. 4

Responding Witness: L.J. Turner

- 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.**
- a. Hyden-Leslie County Water District's billing system does not permit a breakdown of customers by class. To obtain this information would require a manual review of each bill issued since January 1, 2017.
 - b. See response to Item 4a.
 - c. See response to Item 4a.
 - d. See response to Item 4a.

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
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Question No. 5

Responding Witness: L.J. Turner

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.
- a. \$33.09
 - b. \$33.92
 - c. \$33.36
 - d. January 2020 – \$31.40
February 2020 – \$31.94
March 2020 – \$32.78
April 2020 – \$30.35
May 2020 – \$33.74
June 2020 – \$34.12

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
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Question No. 6

Responding Witness: L.J. Turner

- 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.**
- a. Hyden-Leslie County Water District's billing system does not permit a breakdown of customers by class. To obtain this information would require a manual review of each bill issued since January 1, 2017.
 - b. See response to Item 6a.
 - c. See response to Item 6a.
 - d. See response to Item 6a.

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
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Question No. 7

Responding Witness: L.J. Turner

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. Hyden-Leslie County Water District writes off a debt as a bad debt when a customer's service is terminated for non-payment.

b. See table below.

	2018	2019	2020
Jan	\$2,143.96	\$2,568.57	\$2,420.95
Feb	\$1,941.78	\$5,167.12	\$1,183.14
Mar	\$5,329.49	\$2,724.76	\$2,107.47
Apr	\$1,916.17	\$ 241.67	\$2,375.03
May	\$1,991.54	\$4,039.37	\$ 640.61
June	\$1,360.93	\$1,238.88	\$ 622.85
July	\$2,004.07	\$2,738.21	
Aug	\$2,588.63	\$4,039.28	
Sept	\$1,537.4	\$1,562.24	
Oct	\$2,663.87	\$4,336.04	
Nov	\$ 802.39	\$3,252.99	
Dec	\$1,651.58	\$3,364.91	

c. Not applicable.

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
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Question No. 8

Responding Witness: L.J. Turner

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. See table below. Hyden-Leslie County Water District's billing system does not permit a breakdown of customers by class. To obtain this information would require a manual review of each bill issued.

Date	Disconnections
03/31/2020	223
04/30/2020	304
5/31/2020	311
6/30/2020	323

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
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Question No. 9

Responding Witness: L.J. Turner

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. Hyden-Leslie County Water District does not maintain the requested information by customer class. The information set forth below represents pay on time percentages for all customers.

- a. 68.24%
- b. 66.78%
- c. 66.19%
- d. January 2020 – 66.68%
February 2020 – 65%
March 2020 – 67.31%
April 2020 – 65.49%
May 2020 – 68.31%
June 2020 – 69.42%

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff’s Initial Request for Information
Case No. 2020-00085**

Question No. 10

Responding Witness: L.J. Turner

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. a. See table below.

LATE PAYMENT NOTICES					
Month	2015	2016	2017	2018	2019
January	172	239	323	406	413
February	124	205	400	400	325
March	196	129	244	304	347
April	146	196	251	340	372
May	130	283	321	339	337
June	211	255	409	359	370
July	254	373	414	416	363
August	258	571	366	349	358
September	171	261	337	373	428
October	233	332	433	456	400
November	277	293	364	410	380
December	124	336	388	467	457

b. See table below.

TERMINATIONS OF SERVICE					
Month	2015	2016	2017	2018	2019
January	64	0	24	18	105
February	33	0	27	26	54
March	28	65	45	29	4
April	25	0	17	22	40
May	0	0	25	17	5
June	0	21	18	11	0
July	0	21	30	0	0
August	12	29	24	35	0
September	55	37	16	25	34
October	0	45	31	2	0
November	31	12	18	0	0
December	56	0	20	0	0

c. See table below.

NUMBER OF CUSTOMERS					
	2015	2016	2017	2018	2019
January	3611	3657	3662	3669	3693
February	3586	3664	3667	3673	3682
March	3580	3663	3673	3669	3679
April	3600	3671	3676	3671	3699
May	3604	3677	3693	3674	3694
June	3636	3685	3698	3696	3706
July	3643	3679	3703	3700	3702
August	3671	3686	3708	3704	3697
September	3672	3680	3721	3709	3707
October	3681	3684	3696	3712	3704
November	3677	3680	3696	3712	3700
December	3660	3673	3683	3707	3683

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
Case No. 2020-00085**

Question No. 11

Responding Witness: L.J. Turner

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. a. – d. See spreadsheet labeled Late Payment Fees embedded in this Response.

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
Case No. 2020-00085**

Question No. 12

Responding Witness: L.J. Turner

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. \$16,309

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
Case No. 2020-00085**

Question No. 13

Responding Witness: L.J. Turner

- 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. Hyden-Leslie County Water District has not provided any general communications to its customers since March 16, 2020.

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
Case No. 2020-00085**

Question No. 14

Responding Witness: L.J. Turner

- 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. Hyden-Leslie County Water District has experienced a decrease in revenue due to an increase in past due accounts by approximately \$10,000.

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
Case No. 2020-00085**

Question No. 15

Responding Witness: L.J. Turner

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. See response to Item 14.

HYDEN-LESLIE COUNTY WATER DISTRICT

**Response to Commission Staff's Initial Request for Information
Case No. 2020-00085**

Question No. 16

Responding Witness: L.J. Turner

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. No additional information to submit.