

**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  
OLDHAM COUNTY WATER DISTRICT  
TO  
COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION  
DATED JUNE 23, 2020**

**FILED: 7/2/2020**



## 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 Oldham County Water District's Response to Commission Staff's Initial Request for Information was electronically transmitted to the Public Service Commission on July 2, 2020 and Oldham County Water District will file original paper copies of this filing within 30 days of the lifting of the State of Emergency.



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Russell D. Rose, Chief Executive Officer  
Oldham County Water District

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 1**

**Responding Witness: Lacey Cunningham**

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

A-1. 8,564 on May 31, 2020.

See attached Excel spreadsheet.

**Note:** All of Oldham District's responses are provided in narrative form and are also included in the attached Excel spreadsheet.

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 2**

**Responding Witness: Lacey Cunningham**

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

A-2.	Residential	8,109
	Commercial	447
	Industrial	2
	Resale	<u>6</u>
		8,564

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 3**

**Responding Witness: Lacey Cunningham**

- 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.	2017	\$	53.51	(monthly average)
	2018	\$	54.18	
	2019	\$	52.06	
	Jan-2020	\$	47.87	
	Feb-2020	\$	44.14	
	Mar-2020	\$	49.29	
	Apr-2020	\$	48.25	
	May-2020	\$	51.99	

Oldham District only provides water service. Thus, all information provided in this Response is for water customers and the provision of water service.

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 4**

**Responding Witness: Lacey Cunningham**

**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. Our system does not allow us to breakout the past service or late fees per class – see A-6 for best information.**

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 5**

**Responding Witness: Lacey Cunningham**

**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.	2017	\$	49.16	(monthly average)
	2018	\$	50.79	
	2019	\$	48.50	
	Jan-2020	\$	45.80	
	Feb-2020	\$	41.76	
	Mar-2020	\$	47.53	
	Apr-2020	\$	46.77	
	May-2020	\$	49.69	



**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 6**

**Responding Witness: Lacey Cunningham**

**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.

<u>Class</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>Jan-2020</u>	<u>Feb-2020</u>	<u>Mar-2020</u>	<u>Apr-2020</u>	<u>May-2020</u>
Residential	\$ 30.29	\$ 30.07	\$ 31.16	\$ 28.00	\$ 25.86	\$ 28.98	\$ 29.42	\$ 31.40
Commercial	\$ 121.28	\$ 168.37	\$ 109.58	\$ 107.31	\$ 101.08	\$ 105.80	\$ 103.91	\$ 111.08
Industrial	\$ 35,394.62	\$ 33,395.24	\$ 26,893.99	\$ 28,931.19	\$ 26,233.77	\$ 32,695.08	\$ 28,205.08	29,809.73
Resale	\$ 6,719.11	\$ 7,045.91	\$ 9,502.04	\$ 9,722.67	\$ 8,308.77	\$ 9,907.70	\$ 9,843.43	\$ 10,267.77

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 7**

**Responding Witness: Lacey Cunningham**

**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. If a final bill is not paid, we will mail up to two more bills with an "inactive" status. If not paid after these two billings, we change the customer's account status to "bad debt" which takes this customer out of future billings. At this point, a letter is sent to the customer giving them 30 days to pay before their balance is sent to a third party collection agency. We send all bad debts to third party collections monthly.

At the end of each year, any customers with a bad debt older than 5 years is written off, (i.e. for the year ending 12/31/19, debt from 2014 and older (if applicable) is written off).

- b.     2018             \$ 3,185.49  
       2019             \$ 5,735.67  
       2020             none at this point

- c. In January 2019 we changed the frequency of sending customer's balances to a third party collection agency. Previously we sent every six months and beginning in January 2019 we began sending these monthly. This change was made based on the expectation that overall bad debt balances would be lowered. Prior to this change, sending every six months often resulted in unknown addresses.

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 8**

**Responding Witness: Lacey Cunningham**

**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. June 16, 2020:

Residential	58
Commercial	7
Industrial	0
Resale	<u>0</u>
	65

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 9**

**Responding Witness: Lacey Cunningham**

**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. Our system does not allow us to breakout per class.

2017	88%
2018	90%
2019	89%
Jan-2020	89%
Feb-2020	92%
Mar-2020	89%
Apr-2020	88%
May-2020	86%

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff’s Initial Request for Information**

**Question No. 10**

**Responding Witness: Lacey Cunningham**

**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. Our system does not allow us to breakout per class.**

	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>
January	772	800	1,008	1,042	1,114	946
February	979	1,027	1,016	1,025	839	707
March	942	984	962	1,007	967	924
April	963	837	832	827	880	880
May	847	1,003	1,049	866	1,025	706
June	1,025	893	890	722	896	761
July	938	901	901	902	1,069	
August	940	1,079	989	941	940	
September	902	1,073	839	824	919	
October	1,063	994	1,034	959	936	
November	953	1,063	1,102	825	883	
December	943	1,063	1,057	915	1,089	

b. Our system does not allow us to breakout per class.

	2015	2016	2017	2018	2019	2020
January	15	16	15	19	39	10
February	12	11	22	28	24	27
March	19	8	16	15	30	0
April	18	5	26	12	23	0
May	22	18	16	28	24	0
June	17	15	27	25	30	0
July	18	18	18	16	38	
August	19	13	31	36	23	
September	6	22	14	37	34	
October	19	19	23	18	24	
November	23	15	26	28	23	
December	25	19	22	37	26	

c.

<b>TOTAL</b>	2015	2016	2017	2018	2019	2020
January	7,948	8,033	8,181	8,290	8,389	8,519
February	7,941	8,033	8,182	8,291	8,418	8,515
March	7,953	8,035	8,190	8,305	8,426	8,519
April	7,957	8,054	8,209	8,318	8,453	8,545
May	7,972	8,070	8,227	8,345	8,475	8,564
June	7,999	8,099	8,256	8,383	8,491	
July	8,018	8,125	8,268	8,399	8,517	
August	8,017	8,147	8,299	8,393	8,513	
September	8,044	8,168	8,296	8,427	8,526	
October	8,052	8,184	8,304	8,415	8,532	
November	8,060	8,202	8,297	8,392	8,516	
December	8,028	8,192	8,292	8,386	8,503	
<b>RESIDENTIAL</b>	2015	2016	2017	2018	2019	2020
January	7,600	7,657	7,764	7,877	7,962	8,061
February	7,603	7,651	7,767	7,882	7,979	8,064
March	7,600	7,654	7,778	7,890	7,982	8,076
April	7,603	7,672	7,789	7,892	8,003	8,094
May	7,613	7,678	7,791	7,913	8,021	8,109
June	7,625	7,699	7,809	7,949	8,040	
July	7,629	7,720	7,822	7,972	8,058	
August	7,629	7,731	7,857	7,968	8,046	
September	7,653	7,744	7,868	7,995	8,060	
October	7,655	7,754	7,875	7,984	8,068	
November	7,678	7,767	7,873	7,970	8,059	
December	7,656	7,773	7,872	7,961	8,049	

<b><u>COMMERCIAL</u></b>	2015	2016	2017	2018	2019	2020
January	339	367	408	404	418	450
February	329	373	406	400	430	443
March	344	372	403	406	436	435
April	345	373	411	417	442	443
May	350	383	427	423	446	447
June	365	391	438	425	443	
July	380	396	437	418	451	
August	379	407	433	416	459	
September	382	415	419	423	458	
October	388	421	420	422	456	
November	373	426	415	413	449	
December	363	410	411	416	446	

<b><u>INDUSTRIAL</u></b>	2015	2016	2017	2018	2019	2020
January	2	2	2	2	2	2
February	2	2	2	2	2	2
March	2	2	2	2	2	2
April	2	2	2	2	2	2
May	2	2	2	2	2	2
June	2	2	2	2	2	
July	2	2	2	2	2	
August	2	2	2	2	2	
September	2	2	2	2	2	
October	2	2	2	2	2	
November	2	2	2	2	2	
December	2	2	2	2	2	

<b><u>RESALE</u></b>	2015	2016	2017	2018	2019	2020
January	7	7	7	7	7	6
February	7	7	7	7	7	6
March	7	7	7	7	6	6
April	7	7	7	7	6	6
May	7	7	7	7	6	6
June	7	7	7	7	6	
July	7	7	7	7	6	
August	7	7	7	7	6	
September	7	7	7	7	6	
October	7	7	7	7	6	
November	7	7	7	7	6	
December	7	7	7	7	6	

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 11**

**Responding Witness: Lacey Cunningham**

**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.

	2017	2018	2019	2020
January	\$ 2,882.97	\$ 5,163.19	\$ 3,198.26	\$ 2,761.89
February	\$ 5,158.59	\$ 3,412.53	\$ 2,249.51	\$ 1,782.23
March	\$ 4,517.72	\$ 3,242.93	\$ 2,971.86	\$ 2,624.50
April	\$ 4,298.37	\$ 2,382.50	\$ 2,352.11	\$ -
May	\$ 3,039.30	\$ 2,246.42	\$ 2,840.62	\$ -
June	\$ 4,438.29	\$ 2,314.09	\$ 2,414.26	\$ -
July	\$ 3,021.88	\$ 2,882.67	\$ 3,362.63	
August	\$ 3,475.01	\$ 3,987.29	\$ 2,656.11	
September	\$ 2,821.24	\$ 2,779.05	\$ 3,043.65	
October	\$ 3,385.50	\$ 3,071.99	\$ 3,072.24	
November	\$ 5,879.98	\$ 1,119.88	\$ 3,026.40	
December	\$ 5,462.73	\$ 1,408.28	\$ 3,357.73	



**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 12**

**Responding Witness: Lacey Cunningham**

**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. In April 2020, we did not print our system-calculated late payment fee report. Therefore, April 2020 is estimated as the average of March and May late payment fee amounts.

Apr-2020	\$ 2,995.54
May-2020	\$ 3,366.58
Jun-2020	\$ 2,716.69

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 13**

**Responding Witness: Russell D. Rose**

**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. See Exhibit A for the general communication provided on our website.

See Exhibit B for the sign posted on our lobby door and drive-thru window.

# **OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 14**

**Responding Witness: Lacey Cunningham**

**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.

- Refunding customers third-party credit card processing fees to promote electronic payments to keep our employees and customers safe. As of June 30, 2020 this cost was \$9,245.
- Late fees waived beginning mid-March thru June 2020 is estimated to have decreased income by \$9,079. See A-12 above for further details.
- Although we received some donated Personal Protective Equipment (PPE), we purchased \$3,327 of PPE that increased our costs. This includes face coverings/masks, gloves, thermometers, and hand sanitizer.
- Although we did not spend operational time disconnecting/reconnecting service for non-payment, on average we collect \$1,500 a month on reconnection fees which was not collected since March 2020.
- We purchased additional IT equipment to allow us to socially distance our employees for a total of \$1,590.
- In an effort to provide the best possible customer service, we have implemented additional online forms of communication, including applications, line locates, and employee documentation. This service came with a cost of \$99 per month.

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 15**

**Responding Witness: Lacey Cunningham**

**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. We had two part-time employees who chose not to work, which resulted in a combined total cost decrease of approximately \$1,900 per month beginning mid-March. Additionally, since we have suspended some non-essential new construction work, we eliminated some overtime pay.

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 16**

**Responding Witness: Russell D. Rose**

**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.

- We see a potential increase in fuel consumption due to only allowing one employee per vehicle (social distancing).
- We have seen a decrease in the interest rate received on our interest-bearing accounts.
- We have partnered with our County and our local Community Action Agency to allow our customers access to Team KY funds as a possible financial assistance for their utility bill.
- We routinely provide courtesy calls to approximately 200 customers a month to inform them of any potential discontinued service due to non-payment. This has been a standard practice, even prior to COVID-19. Since no disconnections have been made since mid-March, we have also provided an additional call to the customers that would have been subject to disconnection assuming the Commission's moratorium on disconnections was not in effect. We encourage setting up payment plans and information to provide potential financial assistance.
- In an effort to reduce handling paper and transmitting the virus, this pandemic has made us aware that we need to create even more digital services for our employees as well as customers (for example, a possible software update that would allow us to utilize devices in the field).

- The dedication of our employees has allowed us and continues to allow us to serve our community with an exceptional level of service. Our licensed treatment plant operator has worked every weekend since mid-March in an effort to limit contact inside the treatment plant.
- We have not seen a decrease in operating expenses. Our water sold in March and April 2020 was higher than previous years.

Total Water Sold in gallons (000's omitted)

	2018	2019	2020
January	109,140	94,052	99,473
February	90,807	87,114	87,904
March	94,763	91,734	103,949
April	97,807	97,040	101,839
May	114,452	110,773	109,476
June	118,401	99,895	
July	130,495	121,106	
August	114,621	121,230	
September	96,064	138,918	
October	105,770	113,966	
November	96,030	99,374	
December	95,120	87,457	

- See Exhibit C for our interim guidance established March 13, 2020.
- See Exhibit D for our COVID-19 outbreak procedures established April 8, 2020.
- See Exhibit E for the letter provided to our employees on April 8, 2020.

**Exhibit A – General Communication provided on our website**

**Our top priority is to keep our community and employees healthy.  
To avoid unnecessary contact  
OUR LOBBY IS CLOSED  
Please be patient with our team as we move through this process**

**TEAM KENTUCKY FUND FINANCIAL  
ASSISTANCE\_\_\_ Adverse financial impact due to COVID-19:  
Click here to apply or see if you qualify for financial  
assistance <https://teamkyfund.ky.gov/>**

*Looking to avoid social interaction due to the Coronavirus precautions? OCWD has a variety of payment and account management options that you can use from the comfort of your own home. You can manage your account on our website. You can also call (502) 222-1690 and select our Pay By Phone option or speak with one of our Customer Service representatives. **OUR LOBBY IS CLOSED**, but our dedicated employees will be working, you may choose to use our outdoor deposit box or drive-through. If you have additional questions, please call a member of our Customer Service team at (502) 222-1690.*

*To encourage customers to pay electronically off-site rather than coming to the office starting March 16th, 2020 thru **June 30th** we will refund third party fees charged to OCWD customers who pay their bill by using credit cards. The refund will be accomplished by crediting a customer's OCWD account.*



Hand Washing Video <https://youtu.be/qJG72sycQB8>



[https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-covid-spreads.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fabout%2Findex.html](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-covid-spreads.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fabout%2Findex.html)





United States Environmental Protection Agency

<https://www.epa.gov/coronavirus/coronavirus-and-drinking-water-and-wastewater#tapwater>

**TEAM KENTUCKY** **COVID-19 HEALTH TIPS**

## When To Seek Care

To ensure the sickest people receive care, help minimize the spread of infection and maintain resources, please follow the guidelines below when considering whether to seek medical care.

<p><b>Stay home</b></p> <p>If you are worried-well, <b>please stay home.</b></p> <p>Going to a hospital or doctor's office adds to a higher concentration of people and further overwhelms medical staff.</p>	<p><b>Call for advice</b></p> <p>If you are ill, <b>but would not have sought care</b> if not for COVID-19, do not seek care at an ER, hospital or doctor's office.</p> <p>If you want advice, <b>call the Kentucky state hotline (1-800-722-5725) or call your local healthcare provider.</b></p>	<p><b>Seek care</b></p> <p>If you are <b>sick and feel you have an emergency</b>, please call your doctor or <b>seek medical care.</b></p> <p><b>Hospitals and medical staff across the commonwealth stand ready to serve you.</b></p>
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Please visit [kycovid19.ky.gov](https://kycovid19.ky.gov) for the latest updates on COVID-19 in Kentucky or call the Kentucky state hotline at 1-800-722-5725

<https://govstatus.egov.com/kycovid19>

# Response Plan Ensures Reliable Water Service.

March 13, 2020

## **OCWD has a Coronavirus Response**

**Plan** that will ensure the uninterrupted delivery of water service to our community. Critical personnel will continue to provide reliable and quality services to our community. In the meantime, for the latest information on the Coronavirus in Kentucky, please visit [www.kycovid19.ky.gov](http://www.kycovid19.ky.gov).

## **Coronavirus (COVID-19)**

EPA is providing this important information about COVID-19 as it relates to drinking water and wastewater to provide clarity to the public. Americans can continue to use and drink water from their tap as usual. [Learn more](https://www.epa.gov/coronavirus/coronavirus-and-drinking-water-and-wastewater). <https://www.epa.gov/coronavirus/coronavirus-and-drinking-water-and-wastewater>

## **COVID-19: OLDHAM COUNTY WATER'S ROLE IN PROTECTING PUBLIC HEALTH**

Mar 13, 2020

The COVID-19 virus has not been detected in any of the nation's drinking-water supplies. The EPA has reinforced that our disinfection process is effective in neutralizing COVID-19. Based on current evidence, the risk to water supplies is low. Americans can continue to use and drink water from their tap as usual.

At Oldham County Water we are taking proactive measures to ensure we can continue to provide our customers with water services throughout this crisis. Health officials say the provision of safe water, sanitation and hygienic conditions is essential to protecting human health during all infectious disease outbreaks, including the coronavirus outbreak. Frequent and proper hand hygiene is one of the most important things we all can do to prevent infection. That means washing your hands often with soap and water for at least 20 seconds.

At Oldham County Water, our top priority is to keep our community and employees healthy so that we can continue to serve our customers. To avoid unnecessary contact, *our lobby will be closed*, but our dedicated employees will be working, you may choose to use our outdoor deposit box or drive-through, we are encouraging all customers to take advantage of our online services. For payments, questions, or other services, please visit [www.oldhamcounty.com](http://www.oldhamcounty.com) or call 502-222-1690.

The following everyday actions will also help protect you and your loved ones:

- \*Avoid touching your eyes, nose, and mouth.
- \*Avoid close contact with people who are sick.
- \*Stay home when you are sick.
- \*Cover your cough or sneeze with a tissue, throw the tissue in the trash.
- \*Clean and disinfect frequently touched objects and surfaces.

For more information, we recommend you visit the CDC, EPA and state health department web pages for the latest updates:

CDC - <https://www.cdc.gov/coronavirus/2019-ncov/about/index.html>

EPA - Drinking Water & Wastewater FAQs

- <https://www.epa.gov/coronavirus/coronavirus-and-drinking-water-and-wastewater#tapwater>

Kentucky's Department of Public Health - [www.kycovid19.ky.gov](http://www.kycovid19.ky.gov)

Exhibit B

**Our top priority is to keep our community and employees healthy.**

To avoid unnecessary contact, **our lobby is closed**, but our dedicated employees will be working, you may choose to use our outdoor deposit box or drive-through, we are encouraging all customers to take advantage of our online services.

**502-222-1690**

# **OLDHAM COUNTY WATER DISTRICT**

## **Interim Guidance for COVID-19**

### The Oldham County Water District Plan to Prepare and Respond To COVID-19

March 13, 2020

#### **Health and Safety**

1. In the interest of employee health, safety and operational objectives, OLDHAM COUNTY WATER DISTRICT(OCWD) will not allow any OCWD employee and/or temporary workers demonstrating a fever and appearing to have acute respiratory illness symptoms such as cough or shortness of breath to report for duty and/or will be sent home immediately upon discovery of these symptoms. Employees with these symptoms should stay at home and not come to work until they are free of fever for at least 24 hours without the use of fever-reducing or other symptom-altering medicines. Such employees should use the call-in option when they are sick.
2. During this pandemic, OCWD will not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness. Once again, employees may not return to work until they are free of fever for at least 24 hours without the use of fever-reducing or other symptom-altering medicines.
3. OCWD will maintain a flexible policy that permits employees to stay home to care for a sick family member or to care for a child. Employees may use sick leave under those conditions. Please see Personnel Policies and Procedures Manual for further details. During this pandemic an employee may be advanced paid sick leave once all accrued sick leave and vacation leave are exhausted.
4. If an employee is confirmed to have COVID-19 they should immediately inform OCWD's CEO. This will help the DISTRICT know if there has been the chance of an exposure within the facility. In all such cases, confidentiality of every employee shall be maintained by OCWD.
5. OCWD Business travel has been suspended until further notice unless approved by the CEO.
6. As an OCWD family member, we encourage you to avoid large gatherings. Social distancing is the most effective method to reduce the incidence of exposure.

## Exhibit C

### Environmental Considerations

1. In order to decrease the spread of acute respiratory illness and lower the impact of the COVID-19 in the workplace, the following efforts will be enacted:
  - a. Make efforts to reduce transmission among employees.
  - b. Please stay in your work area. Do not visit other departments. Please send communications via electronic means rather than face to face.
  - c. We will make efforts to protect staff who are at higher risk for adverse health complications. If you feel that you are at risk, please confer with the CEO or your supervisor.
  - d. We will maintain operations and minimize adverse effects on other entities in our supply chain.
  
2. Key considerations to be utilized by OCWD when making decisions on appropriate responses:
  - a. Disease severity in our local community and surrounding areas;
  - b. The impact of disease on employees that are vulnerable and may be high risk;
  - c. We will prepare for the possibility of increased employee absences;
  - d. We will monitor and respond to absenteeism in the DISTRICT; and
  - e. We are prepared to change business practices if needed to maintain critical operations.
  
3. Social Distancing
  - a. Respiratory etiquette and hand hygiene are encouraged, and routine cleaning of commonly touched surfaces should be performed regularly.
  - b. DISTRICT tours and visits from vendors, retirees, family members, and any other entities shall be suspended until further notice unless approved by the CEO.
  - c. We will restrict meetings exceeding 3 or more employees. We strongly encourage the use of texting, mobile phones, email, and START MEETING.
  - d. The DISTRICT will provide wipes and hand sanitizers to the extent they are available. We advise cleaning surfaces, tools, and equipment with wipes after use to reduce the risk of exposure to others.

## Exhibit D

# OCWD - COVID-19 Outbreak Procedures

### **I. OBJECTIVES:**

To establish and interpret operational procedures in the event of the COVID-19 outbreak during the National Emergency.

### **II. STRATEGY:**

As a water utility we cannot stop providing services due to any outbreak; however, we may adjust our daily operational procedures appropriately. The purpose of this procedure is to outline temporary operational procedures during the COVID-19 outbreak.

### **Emergency Operational Procedure:**

#### **Step I: No confirmed local cases of COVID-19.**

1. The practice of working delinquent accounts may be discontinued until further notice to sustain hygiene and sanitation during the outbreak.
2. Every effort will be made in the field to avoid making personal contact with anyone other than Water District personnel.
3. Licensed Water treatment operators have been instructed not to co-mingle with other employees and not to attend safety meetings or any company functions. We must have zero contact until such point that it has been determined that the greatest risk has passed. We recommend using electronic forms of communication.
4. Meals may be served daily to Water District personnel to limit outside contact.
5. Ask employees to limit any person to person contact if possible, while out in the field until further notice.
6. Ask employees to be self-conscious of personal contact after work hours.
7. Possible segregation or isolation of water district personnel to help minimize effects of a confirmed case within the water district. These measures include, but are not limited to, personnel being limited to specific working areas, adjusted work schedules, personnel working from home, housing staff on site or modifications to typical shifts, including communication with employees on expected roles and responsibilities. All employees should keep a 6ft-10ft distance from each other while working.
  - a. Office employees are limited one person in the front office or individual office space per day and sanitizing the common areas at the ending and beginning of each shift.
  - b. Operating employees are to pass paperwork thru drive thru only and coordinate trips inside the shop area. Each employee should operate from their work vehicle (1 employee per truck) or individual office space.

## Exhibit D

8. Communicate frequently with suppliers of essential treatment chemicals and supplies.
  - a. Make every effort to keep supplies of essential inventory items/chemicals at a maximum.
    - i. Treatment Chemicals
    - ii. Gasoline
    - iii. Diesel Fuel
9. Coordinate with local public officials to ensure utility workforce has access to facilities and can make necessary repairs to distribution or collection systems if travel restrictions are imposed in a community.
10. Communicate with customers about the safety of the water supply.

### **Step II: Confirmed case of COVID-19 within Oldham County or any county bordering Oldham. (including all items from step I)**

1. Daily work procedure will be adjusted to limit immediate contact with any Water District Customers.
2. The office doors will be closed to all outside contacts without approval from the CEO.
3. Consider alternative payment methods for typical face-to-face transactions with customers.
  - a. All business will be conducted at the drive-thru window.
  - b. Consider refunding third party fees charged to OCWD customers who pay their bill by using credit cards. The refund will be accomplished by crediting a customer's OCWD account. This will encourage more customers to pay offsite electronically rather than coming to the office to pay face-to-face.
4. Any non-essential field work may be suspended.

### **Step III: A County, State, or National Quarantine for COVID-19 has been issued. (including all items from step I & II)**

1. All employees are to report to work in the event of any County, State, or National quarantine.
2. The drive-thru window will be used for any emergency business.
3. Only essential operations, meter reading, and emergency work will be performed during the quarantine period.



## Exhibit E

### Commissioners

J. W. Hall  
Jody Curry  
Melvin Milburn  
Wm. Robert Durbin  
Jason Greer



Chief Executive Officer  
Russell D. Rose

April 8<sup>th</sup>, 2020

The bearer of this letter is an essential critical infrastructure worker in the Water Sector and is providing a vital public health and safety service. **Please allow passage of this person, property, and/or equipment to the intended destination.** For verification or inquiries regarding this request, please contact Russ Rose Chief Executive Officer, Oldham County Water District.

On March 27, 2020, U.S. Environmental Protection Agency Administrator Andrew Wheeler wrote to the Nation's Governors urging all States to ensure that water and wastewater workers, as well as the manufacturers and suppliers who provide vital goods and services to the water sector, are considered essential workers and businesses by State authorities when enacting restrictions to curb the spread of the Novel Coronavirus Disease (COVID-19).

On March 16, 2020, the President issued *Coronavirus Guidelines for America* which states "[i]f you work in a critical infrastructure industry, as defined by the Department of Homeland Security ... you have a special responsibility to maintain your normal work schedule." Following this guidance, on March 28, 2020, the Department of Homeland Security (DHS) released *Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response*. The DHS guidance specifically recognizes the following water and wastewater workers and suppliers to the water sector (e.g., chemical manufacturers and delivery services) as essential critical infrastructure workers:

Employees needed to operate and maintain drinking water infrastructure, including:

- Operational staff at water authorities.
- Operational staff at community water systems.
- Workers repairing water conveyances and performing required sampling or monitoring, including field staff.
- Operational staff for water distribution and testing.
- Operational staff and technical support for SCADA Control systems.
- Chemical and equipment suppliers to water and wastewater systems and personnel protection.
- Workers who maintain digital systems infrastructure supporting water operations.

Thank you for your efforts to contain and minimize the spread of the COVID-19. We are dedicated to working with you to ensure the safety of the water workforce and the continued operations of water and wastewater services in support of our nation's public health and safety.

Sincerely,

A handwritten signature in blue ink that reads "Russell D. Rose".

Russell D. Rose  
Chief Executive Officer  
Oldham County Water District