

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

**FILED: 7/16/2020**

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

**In the Matter of:**

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

**CERTIFICATION OF RESPONSE OF Mountain Water District TO  
COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION**

This is to certify that I have supervised the preparation of Mountain Water District's Responses to Commission Staff's Initial Request for Information. The response submitted on behalf of Mountain Water District is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Date: July 16, 2020



---

KEVIN LOWE, OFFICE MANAGER  
Mountain Water District

## 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 Mountain 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 16, 2020 and Mountain Water District will file original paper copies of this filing within 30 days of the lifting of the State of Emergency.



---

KEVIN LOWE, OFFICE MANAGER  
Mountain Water District

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 1**

**Responding Witness: KEVIN LOWE**

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

A-1. Please see spreadsheet tab Q-1

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 2**

**Responding Witness: KEVIN LOWE**

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

A-2. Please see excel spreadsheet tap Q-2

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 3**

**Responding Witness: KEVIN LOWE**

**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. Please see spreadsheet tab Q-3**

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 4**

**Responding Witness: KEVIN LOWE**

- 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. Please see spreadsheet tab Q-4**

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 5**

**Responding Witness: KEVIN LOWE**

**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. Please see spreadsheet tab Q-5**

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 6**

**Responding Witness: KEVIN LOWE**

- 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. Please see spreadsheet tab Q-6**

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 7**

**Responding Witness: KEVIN LOWE**

**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. Mountain Water District performs bad debt write offs on a quarterly basis in January, April, July, and October. When the District does the write offs, they are done for accounts that have be inactive for a minimum of 6 months.
- b. Please see spreadsheet tab Q-7b
- c. The District hasn't changed its calculation or determination of bad-debt; however, we haven't completed since January due to covid-19 layoffs.

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 8**

**Responding Witness: KEVIN LOWE**

**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. Please see spreadsheet tab Q-8

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 9**

**Responding Witness: KEVIN LOWE**

**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. Please see spreadsheet tab Q-9**

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 10**

**Responding Witness: KEVIN LOWE**

**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. Please see spreadsheet tab Q-10**

**Note that our software does not separate termination notices issued by class or service type. Also, our software does not separate terminations by class.**

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 11**

**Responding Witness: KEVIN LOWE**

**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. Please see spreadsheet tab Q-11

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 12**

**Responding Witness: KEVIN LOWE**

**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. Please see spreadsheet tab Q-12

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 13**

**Responding Witness: KEVIN LOWE**

**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.**

The communications the District has used regarding these issues is automated phone messages to past due accounts and a statement on our website.

The automated phone message used is as follows:

**THIS IS A REMINDER THAT YOUR ACCOUNT IS NOW PAST DUE. PLEASE SUBMIT PAYMENT AS SOON AS POSSIBLE OR CONTACT OUR OFFICE IF YOU NEED ASSISTANCE AT**

**606-631-9162.**

Our website stated the following:

**In an effort to protect the health of our employees and our customers, the District's office is currently closed to the public due to the Covid-19 pandemic. The District will still be available via telephone at 606-631-9162 or email at [mwdcustomerservice@mtwater.org](mailto:mwdcustomerservice@mtwater.org). We will continue to provide all services during this time. Customers may pay their bill via mail at P.O. Box 3157, Pikeville, KY 41501, the drop box at the District's office at 6332 Zebulon Highway, online at [www.mountainwaterdistrictky.com](http://www.mountainwaterdistrictky.com) , or via our automated payment line at 1-855-984-1204.**

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 14**

**Responding Witness: KEVIN LOWE**

**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. Please see spreadsheet tab Q-14

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 15**

**Responding Witness: KEVIN LOWE**

**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. Please see spreadsheet tab Q-15

**Mountain Water District**

**CASE NO. 2020-00085**

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

**Question No. 16**

**Responding Witness: KEVIN LOWE**

**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.

At this time, Mountain Water District is not proposing any additional information to be considered by the Commission in amending or vacating its previous Orders in this matter.