

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Application of Water Service Corporation)	
of Kentucky for a General Adjustment)	Case No. 2020-00160
in Existing Rates)	

REBUTTAL TESTIMONY OF STEPHEN R. VAUGHN

1 **Q1. PLEASE STATE YOUR NAME, JOB TITLE, EMPLOYER AND BUSINESS**
2 **ADDRESS.**

3 A1. My name is Stephen R. Vaughn. I am the State Operations Manager for Water Service
4 Corporation of Kentucky, Inc. (“Company” or “WSCK”). My business address is 102
5 Water Plant Rd., Middlesboro, Kentucky, 40965.

6 **Q2. MR. VAUGHN, HAVE YOU PREVIOUSLY SUBMITTED DIRECT**
7 **TESTIMONY IN THIS PROCEEDING?**

8 A2. Yes, I have.

9 **Q3. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS**
10 **PROCEEDING?**

11 A3. My rebuttal testimony will address the direct testimony of the City of Clinton’s witness
12 Shannon Payne, as it relates to the Company’s water operations and contractual
13 wastewater operations in the City of Clinton.

14 **Q4. HOW DO YOU RESPOND TO MS. PAYNE’S CLAIM THAT SHE WAS NOT**
15 **TRAINED ON THE ORACLE SOFTWARE?**

16 A4. Ms. Payne would only need to post payments, and make payments within the Oracle
17 software, CC&B. Ms. Payne was trained on these processes at the time the city started
18 taking payments for WSCK. This is a function that she has performed for many years
19 and training for utilizing other functions of the Oracle software is unnecessary.

1 **Q5. HOW DO YOU RESPOND TO THE ISSUES RAISED BY THE CLINTON FIRE**
2 **DEPARTMENT AT THE CITY COUNCIL MEETING, AS MENTIONED BY MS.**
3 **PAYNE?**

4 A5. WSCK sends a letter to the fire departments in its service territories annually, most
5 recently dated September 15, 2020. The 2019 letter in question, that was sent to the
6 Clinton Fire Department, erroneously indicated that all the hydrants in the system were
7 flushing only. Though the letter indicated all hydrants in the system were flushing
8 hydrants, in actuality only a portion of the hydrants are flushing hydrants (i.e. do not meet
9 firefighting code). Once the error was noticed, a revised letter was both, mailed and hand-
10 delivered to Chief Weatherford.

11 This issue was brought up again during the special called city council meeting in January
12 of 2020. Chief Weatherford, as well as the county's Emergency Management Director
13 were in attendance. They were advised that the hydrants which do not meet firefighting
14 code due to main size and were to be considered flushing hydrants, as indicated by collars
15 placed around the nozzles.

16 **Q7. HOW DO YOU RESPOND TO MS. PAYNE'S CLAIM REGARDING WSCKY'S**
17 **CLINTON OFFICE REMAINING LOCKED?**

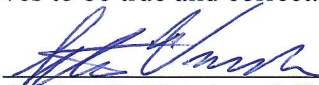
18 A7. The office doors are kept locked when staff is out working in the field. When the Covid-
19 19 pandemic outbreak started, WSCK closed all its offices, to protect the staff as well as
20 the general public. Under normal circumstances, the office is open for customers to enter,
21 and speak to the local staff.

22 **Q8. DOES THIS CONCLUDE YOUR PREPARED REBUTTAL TESTIMONY?**

23 A8. Yes, it does.

AFFIDAVIT

The undersigned, Stephen R. Vaughn., being duly sworn, deposes and says that he is the State Manager for the Water Service Corporation of Kentucky, within Utilities, Inc., that is authorized to submit this testimony on behalf of Water Service Corporation of Kentucky, and that the information contained in the testimony is true and accurate to the best of his knowledge, information and belief, after reasonable inquiry, and as to those matters that are based on information provided to him, he believes to be true and correct.



Stephen R. Vaughn., Affiant

NOTARY CERTIFICATE

STATE OF Kentucky
COUNTY OF Bell

Subscribed, acknowledged and sworn to before me by Stephen R Vaughn on this 2nd day of November, 2020.

My commission expires: 2/28/2023.

Megan C. Hever
NOTARY PUBLIC

