

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRIC TARIFF FILING OF)
HENDERSON WATER UTILITY))
REVISING THE WHOLESALE)
WATER SERVICE RATES)**

CASE NO. 2021-00067

FIRST REQUEST FOR INFORMATION
TO HENDERSON WATER UTILITY FROM
HENDERSON COUNTY WATER DISTRICT
AND
BEECH GROVE WATER SYSTEM, INC.

HENDERSON COUNTY WATER DISTRICT (“HCWD”) and BEECH GROVE WATER SYSTEM, INC. (BGWS) pursuant to 807 KAR 5:01, are to file with the Commission an electronic version of the following information. The information requested herein is due on May 19, 2021. HCWD and BGWS direct Henderson Water Utility (“Henderson Water”) to the Commission’s March 16, 2020, and March 24, 2020, orders in Case No. 2020-00085¹ regarding filings with the Commission. Original documents are to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and

¹Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky, PSC Mar. 16, 2020), Order at 5-6. Case No. 2020-00085, *Electronic Emergency Docket related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1-3.

indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Henderson Water shall make timely amendment to any prior response if Henderson Water obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Henderson Water fails or refuses to furnish all or part of the requested information, Henderson Water shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper

containing personal information, Henderson Water shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. State the effect Henderson Water's increased costs have had on Henderson Water's contract with the City of Sebree.

2. Produce a copy of any amendment to the City of Sebree contract within the last twelve (12) months.

3. State the effect Henderson Water's increased costs have had on its contract with Tyson Foods.

4. Produce a copy of any amendment to Tyson Foods' contract with Henderson Water executed in the last twelve (12) months.


DORSEY, GRAY, NORMENT & HOPGOOD
318 Second Street
Henderson, KY 42420
Telephone (270) 826-3965
Telefax (270) 826-6672
Attorneys for Henderson County Water District and
Beech Grove Water System, Inc.

By _____


J. Christopher Hopgood
chopgood@dkgnlaw.com

The foregoing was served by electronic mail of a true and correct copy of same to the following on this 30th day of April, 2021:

Hon. Eric Shappell
King, Deep and Branaman
Post Office Box 43
Henderson, Ky 42419



counsel for Henderson County Water District and
Beech Grove Water System, Inc.