



## BRIAN CUMBO

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ADMITTED IN KY AND WV

October 14, 2021

Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

RE: Martin County Water District  
PSC Case No. 2021-00154

To Whom It May Concern:

Enclosed please find Response to the Martin County Concern Citizen's Post Hearing Data Request dated September 27, 2021 regarding the above matter.

Thank you for your attention to this matter.

Very truly yours,



BRIAN CUMBO

BC/ld

Enclosure

cc: Martin County Water District  
Hon. Mary Varson Cromer

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF )  
MARTIN COUNTY WATER DISTRICT )  
FOR ALTERNATIVE RATE ADJUSTMENT )

CASE NO. 2021-00154

**RESPONSE TO MARTIN COUNTY CONCERNED  
CITIZEN’S POST-HEARING DATA REQUESTS**

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1. Please provide an accounting that shows the per month amount and number of distributions from customer assistance funding to customer balances from October 2020 to the present and the type of customer assistance being disbursed in each instance.

RESPONSE: See Exhibit #1.

2. For the months of January 2021 through August 2021, please provide in increments of usage of 200 gallons per month, the number of residential customers with monthly consumption equal to 2000 gallons per month or less. Separately provide, by month, for each such month, the total number of residential customers with monthly usage equal to or less than 2000 gallons per month. If the total number is not equal to the sum of the ranges of 200 gallons, provide a detailed explanation of why there is a difference.

RESPONSE: See Exhibit #2.

3. Confirm or deny: According to the march 16, 2018 PSC Order approving MCWD’s Debt Service Surcharge, “Debt Service Surcharge is to be used to help Martin District either pay its accounts payable or secure a loan to pay existing past due accounts.” If denied, provide a detailed explanation of the basis for the denial. If the purpose of the Debt Service Surcharge has

changed since this PSC Order, provide a detailed explanation of the current purpose of the Surcharge and a citation to the PSC Order approving that modified purpose.

RESPONSE: The PSC Order speaks for itself.

4. Confirm or deny: According to the March 16, 2018 PSC Order approving MCWD's Debt Service Surcharge, "Martin District is authorized to assess a monthly surcharge of \$4.19 on each customer upon the creation of an interest-bearing account with a financial institution, continuing until Martin District has discharged all accounts payable existing on or before April 1, 2018." If denied, provide a detailed explanation of the basis for the denial. If the purpose of the Debt Service Surcharge has changed since this Order, provide a detailed explanation of the current purpose of the Surcharge and a citation to the PSC Order approving that modified purpose.


RESPONSE: The PSC Order speaks for itself.

5. Confirm or deny: According to the March 16, 2018 PSC Order approving MCWD's Debt Service Surcharge, "Martin District shall use the proceeds of the surcharge solely for the discharge of its accounts payable incurred prior to April 1, 2018." If denied, provide a detailed explanation of the basis for the denial. If the purpose of the Debt Service Surcharge has changed since this PSC Order, provide a detailed explanation of the current purpose of the Surcharge and a citation to the PSC Order approving that modified purpose.

RESPONSE: The Order of the PSC speaks for itself.

6. Please provide a copy of each PSC Order explicitly authorizing an expenditure by MCWD from the funds generated by the Debt Service Surcharge. (See, March 16, 2018, PSC Order, Docket 2018-00017, page 14: "Martin District shall make no disbursement from the surcharge account without explicit permission granted in a Commission Order.")

RESPONSE: The Orders of the PSC speak for themselves.

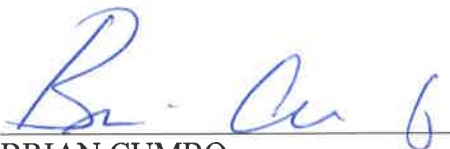
  
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WATER DISTRICT  
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TELEPHONE: (606) 298-0428  
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EMAIL: cumbolaw@cumbolaw.com

**CERTIFICATE OF SERVICE**

This will certify that a true and correct copy of the foregoing was served via electronic filing on this the 14 day of October, 2021, to the following:

Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

Hon. Mary Varson Cromer  
Appalachian Citizens' Law Center, Inc.  
317 Main Street  
Whitesburg, KY 41858


  
BRIAN CUMBO

Responses of Martin County Water District (Martin District) to the Martin County Concerned Citizen's (MCCC) Post Hearing Request for Information to Martin County Water District dated September 27, 2021; Case No. 2021-00154

Certifications


The following individuals prepared or supervised the preparation of the responses indicated on the behalf of Martin District. The responses are true and accurate to the best of the indicated person's knowledge, information, and belief after a reasonable inquiry.

Cassandra Moore, Office Manager  
Alliance Water Resources, Inc.  
Responses to PSC requests #1-5



Signature

Craig Miller, Division Manager  
Alliance Water Resources, Inc.  
Responses to PSC requests #6-8



Signature

# EXHIBIT #1

## RESPONSE TO MCCC QUESTION #1

	MONTH/YEAR	TOTAL DISTRIBUTIONS	TOTAL RECEIVED
HEALTHY AT HOME DWWW	2020-NOVEMBER	61	\$17,451.38
HEALTHY AT HOME CRISIS	2020-NOVEMBER	18	\$4,869.63
	2020-DECEMBER	71	\$17,549.53
CARES 2020-2021	2020-AUGUST	65	\$8,303.10
	2020-SEPTEMBER	29	\$3,455.22
	2020-OCTOBER	23	\$2,827.91
	2020-NOVEMBER	14	\$1,543.23
	2020-DECEMBER	10	\$1,489.54
	2021-JANUARY	1	\$200.00
	2021-FEBRUARY	2	\$285.27
	2021-MARCH	2	\$253.47
	2021-APRIL	3	\$516.73
	2021-MAY	9	\$947.49
2021-JUNE	12	\$1,632.63	
HEALTHY AT HOME SUBSIDY	2020-DECEMBER	151	\$75,500.00
	<b>TOTALS:</b>	<b>471</b>	<b>\$136,825.13</b>

## EXHIBIT #2

### RESPONSE TO MCCC QUESTION #2



YEAR: 2021

\*\* RATE TOTALS \*\*

TOT-CONS TOT-BILLS

RANGE: 0 - 200

TABLE: R		
JANUARY	330	11
FEBRUARY	80	11
MARCH	0	8
APRIL	0	10
MAY	90	10
JUNE	10	9
JULY	0	11
AUGUST	130	14
TOTALS:	640	84

RANGE: 201 - 400

TABLE: R		
MAY	0	1
JUNE	250	1
JULY	120	1
AUGUST	0	1
TOTALS:	370	4

RANGE: 401 - 600

TABLE: R		
JANUARY	110	2
FEBRUARY	50	2
MARCH	50	2
APRIL	260	2
MAY	20	2
JUNE	40	2
JULY	60	2
AUGUST	850	3
TOTALS:	1,440	17

RANGE: 601 - 800

TABLE: R		
JANUARY	230	1
FEBRUARY	80	1
MARCH	260	1
APRIL	0	1
MAY	0	1
JUNE	180	2
JULY	180	2
AUGUST	490	2

YEAR: 2021

\*\* RATE TOTALS \*\*

TOT-CONS TOT-BILLS

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TOTALS:	1,420	11
RANGE: 801 - 1000		
TABLE: R		
JANUARY	820	1
FEBRUARY	0	1
MARCH	30	1
APRIL	0	3
MAY	0	3
JUNE	750	3
JULY	370	3
AUGUST	690	3
TOTALS:	2,660	18
RANGE: 1001 - 1200		
TABLE: R		
TOTALS:	0	0
RANGE: 1201 - 1400		
TABLE: R		
TOTALS:	0	0
RANGE: 1401 - 1600		
TABLE: R		
APRIL	0	2
MAY	530	2
JUNE	740	2
JULY	630	2
AUGUST	1,140	2
TOTALS:	3,040	10
RANGE: 1601 - 1800		
TABLE: R		
JANUARY	0	2
FEBRUARY	0	2
MARCH	80	2
APRIL	310	3
MAY	150	2
JUNE	100	2
JULY	1,120	2

YEAR: 2021

\*\* RATE TOTALS \*\*

TOT-CONS                      TOT-BILLS

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AUGUST	1,510	2
TOTALS:	3,270	17

RANGE: 1801 - 2000

TABLE: R		
JANUARY	2,000	1
TOTALS:	2,000	1

YEAR: 2021

\*\* CLASS TOTALS \*\*

TOT-CONS TOT-BILLS

RANGE: 0 - 200

CUSTOMER CLASS: R

JANUARY	330	11
FEBRUARY	80	11
MARCH	0	8
APRIL	0	10
MAY	90	10
JUNE	10	9
JULY	0	11
AUGUST	130	14
TOTALS:	640	84

RANGE: 201 - 400

CUSTOMER CLASS: R

MAY	0	1
JUNE	250	1
JULY	120	1
AUGUST	0	1
TOTALS:	370	4

RANGE: 401 - 600

CUSTOMER CLASS: R

JANUARY	110	2
FEBRUARY	50	2
MARCH	50	2
APRIL	260	2
MAY	20	2
JUNE	40	2
JULY	60	2
AUGUST	850	3
TOTALS:	1,440	17

RANGE: 601 - 800

CUSTOMER CLASS: R

JANUARY	230	1
FEBRUARY	80	1
MARCH	260	1
APRIL	0	1
MAY	0	1
JUNE	180	2
JULY	180	2
AUGUST	490	2

YEAR: 2021

\*\* CLASS TOTALS \*\*

TOT-CONS TOT-BILLS

---

TOTALS:	1,420	11
RANGE: 801 - 1000		
CUSTOMER CLASS: R		
JANUARY	820	1
FEBRUARY	0	1
MARCH	30	1
APRIL	0	3
MAY	0	3
JUNE	750	3
JULY	370	3
AUGUST	690	3
TOTALS:	2,660	18
RANGE: 1001 - 1200		
CUSTOMER CLASS: R		
TOTALS:	0	0
RANGE: 1201 - 1400		
CUSTOMER CLASS: R		
TOTALS:	0	0
RANGE: 1401 - 1600		
CUSTOMER CLASS: R		
APRIL	0	2
MAY	530	2
JUNE	740	2
JULY	630	2
AUGUST	1,140	2
TOTALS:	3,040	10
RANGE: 1601 - 1800		
CUSTOMER CLASS: R		
JANUARY	0	2
FEBRUARY	0	2
MARCH	80	2
APRIL	310	3
MAY	150	2
JUNE	100	2
JULY	1,120	2

YEAR: 2021

\*\* CLASS TOTALS \*\*

TOT-CONS TOT-BILLS

---

AUGUST	1,510	2
TOTALS:	3,270	17

RANGE: 1801 - 2000  
CUSTOMER CLASS: R

JANUARY	2,000	1
TOTALS:	2,000	1

C O N S U M P T I O N   S U M M A R Y  
Y E A R   T O T A L S

TOT-CONS                      TOT-BILLS

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YEAR: 2021		
RANGE: 0 - 200		
	640	84
RANGE: 201 - 400		
	370	4
RANGE: 401 - 600		
	1,440	17
RANGE: 601 - 800		
	1,420	11
RANGE: 801 - 1000		
	2,660	18
RANGE: 1001 - 1200		
	0	0
RANGE: 1201 - 1400		
	0	0
RANGE: 1401 - 1600		
	3,040	10
RANGE: 1601 - 1800		
	3,270	17
RANGE: 1801 - 2000		
	2,000	1
GRAND TOTALS:	14,840	162

CONSUMPTION TYPE: TOTAL

CUST. CLASS	RATE TABLE	BILLED CONSUMPTION	TOTAL # CONSUMPTION BILLS
R	R	0	0 1
R	R	0	0 8
R	R	0	0 6
R	R	0	0 1
R	R	170	170 5
R	R	0	0 2
R	R	0	0 1
R	R	60	60 2
R	R	0	0 1
R	R	0	0 8
R	R	0	0 9
R	R	0	0 8
R	R	200	200 2
R	R	0	0 4
R	R	0	0 2
R	R	0	0 1
R	R	30	30 2
R	R	0	0 1
R	R	0	0 8
R	R	10	10 2
R	R	50	50 2
R	R	120	120 8



10-11-2021 10:46 AM  
SERVICE CODE: 010-WATER  
TABLES SELECTED:

C O N S U M P T I O N   S U M M A R Y  
CONSUMPTION RANGE:

PAGE: 9  
400

201 THRU

CONSUMPTION TYPE: TOTAL

A	CUST. CLASS	RATE TABLE	BILLED CONSUMPTION	TOTAL # OF CONSUMPTION BILLS
	R	R	370	370 4

SERVICE CODE: 010-WATER

CONSUMPTION RANGE:

401 THRU

600

TABLES SELECTED:

CONSUMPTION TYPE: TOTAL

CUST. CLASS	RATE TABLE	BILLED CONSUMPTION	TOTAL CONSUMPTION	# OF BILLS
R	R	410	410	8
R	R	480	480	1
R	R	550	550	8

10-11-2021 10:46 AM  
SERVICE CODE: 010-WATER  
TABLES SELECTED:

C O N S U M P T I O N   S U M M A R Y  
CONSUMPTION RANGE:

PAGE: 11  
601 THRU 800

CONSUMPTION TYPE: TOTAL

CUST. CLASS	RATE TABLE	BILLED CONSUMPTION	TOTAL # OF CONSUMPTION BILLS
R	R	640	640 8
R	R	780	780 3

10-11-2021 10:46 AM  
SERVICE CODE: 010-WATER  
TABLES SELECTED:

C O N S U M P T I O N   S U M M A R Y  
CONSUMPTION RANGE:

PAGE: 12  
801 THRU 1,000

CONSUMPTION TYPE: TOTAL

CUST. CLASS	RATE TABLE	BILLED CONSUMPTION	TOTAL # OF CONSUMPTION BILLS
R	R	990	990 5
R	R	850	850 8
R	R	820	820 5

10-11-2021 10:46 AM  
SERVICE CODE: 010-WATER  
TABLES SELECTED:

C O N S U M P T I O N   S U M M A R Y  
CONSUMPTION RANGE:

PAGE: 13  
1,401 THRU 1,600

CONSUMPTION TYPE: TOTAL

CUST. CLASS	RATE TABLE	BILLED CONSUMPTION	TOTAL CONSUMPTION	# OF BILLS
R	R	1,570	1,570	5
R	R	1,470	1,470	5

10-11-2021 10:46 AM  
SERVICE CODE: 010-WATER  
TABLES SELECTED:

C O N S U M P T I O N   S U M M A R Y  
CONSUMPTION RANGE:

PAGE: 14  
1,601 THRU 1,800

CONSUMPTION TYPE: TOTAL

CUST. CLASS	RATE TABLE	BILLED CONSUMPTION	TOTAL CONSUMPTION	# OF BILLS
R	R	1,660	1,660	9
R	R	1,610	1,610	8

10-11-2021 10:46 AM  
SERVICE CODE: 010-WATER  
TABLES SELECTED:

C O N S U M P T I O N   S U M M A R Y  
CONSUMPTION RANGE:

PAGE: 15  
1,801 THRU 2,000

CONSUMPTION TYPE: TOTAL

CUST. CLASS	RATE TABLE	BILLED CONSUMPTION	TOTAL CONSUMPTION	# OF BILLS
R	R	2,000	2,000	1
GRAND TOTALS:		14,840	14,840	162

## SELECTION CRITERIA

## REPORT SELECTION

SELECTION BY: < All Zones >  
CUSTOMER CLASS: Include: R  
SERVICE CODE: 010 WATER  
RATE TABLE: Include: R

## COMMENTS:

ALL COMMENTS REQUIRED: NO

VALUE

COMMENT CODES: NONE SELECTED

## ANALYSIS OPTIONS

CONSUMPTION PERIOD(S) FROM: 01/2021 THROUGH 08/2021  
CONSUMPTION TEST BASED ON: TOTAL  
CONSUMPTION TYPE TO USE: BILLED CONSUMPTION  
PRINT MONTHLY TOTALS: YES  
COMBINE YEAR TOTALS: NO  
PRINT ACCOUNT DETAIL: YES

## CONSUMPTION RANGES

-	200
201 -	400
401 -	600
601 -	800
801 -	1000
1001 -	1200
1201 -	1400
1401 -	1600
1601 -	1800
1801 -	2000

\*\* END OF REPORT \*\*