



**BRIAN CUMBO**

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ADMITTED IN KY AND WV

May 26, 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 Notice of Filing Responses to Public Service Commission's Second Data Request Dated May 24, 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

**NOTICE OF FILING RESPONSES TO PUBLIC SERVICE  
COMMISSION'S SECOND DATA REQUEST DATED MAY 24, 2021**

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Comes the Martin County Water District, by counsel, and hereby gives Notice of Filing of the attached Responses to the Public Service Commission's Second Set of Data Requests Dated May 24, 2021.



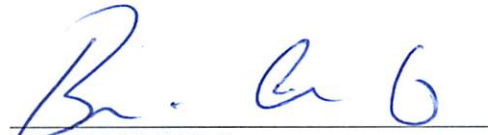
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**CERTIFICATE OF SERVICE**

This will certify that a true and correct copy of the foregoing was emailed on this the 26 day of May, 2021, to the following:

Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602  
[Ariel.Miller@ky.gov](mailto:Ariel.Miller@ky.gov)  
[Brittany.Koenig@ky.gov](mailto:Brittany.Koenig@ky.gov)  
[Jesse.Fries@ky.gov](mailto:Jesse.Fries@ky.gov)  
[Nancy.Vinsel@ky.gov](mailto:Nancy.Vinsel@ky.gov)

Hon. Mary Varson Cromer  
Appalachian Citizens' Law Center, Inc.  
317 Main Street  
Whitesburg, KY 41858  
[mary@appalachianlawcenter.org](mailto:mary@appalachianlawcenter.org)

  
BRIAN CUMBO

# MARTIN COUNTY UTILITY BOARD

387 East Main Street Suite 140  
INEZ, KY 41224

606-298-3885 OFFICE

606-298-4913 Fax

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May 25, 2021

Linda C. Bridwell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
PO Box 615  
Frankfurt, KY 40602-0615

Re: Responses to the PSC's Second Set of Data Requests; Case No.  
2021-00154

Dear Ms. Bridwell:

Attached are Martin County Water District's responses to the PSC's Second Set of Data Requests dated May 24th, 2021.

We look forward to discussing the information with you.

Sincerely,

*Craig Miller*

Craig Miller  
Alliance Water Resources, Inc.  
Division Manager

cc: Jimmy Don Kerr, Martin County Water District  
James A. Sneed, AWR  
Ann Perkins, AWR  
Brian Cumbo

Question #1 How far past due is the utility on paying Alliance the management fee?

Alliance invoices MCW twice monthly on the first of the month and the 16<sup>th</sup> of the month with each due in 15 days. The April 1<sup>st</sup>, April 15<sup>th</sup>, and the May 1<sup>st</sup> invoices are all past due as of May 25, 2021.

2) How much has Alliance paid on behalf of the utility a) for 2020 calendar year; b) to present date.

<b>DISTRICT EXPENSES PAID BY AWR</b>		
<i>Contractually these should have been District Expenses Noted here for Budgeting and Rate Setting Purposes</i>		
<b>FYE 2020</b>		
<b>Item</b>	<b>Description</b>	<b>Cost</b>
Incode	New Billing Software for Office Accountability	\$10,000
Vacation	Paid Outstanding Vacation Debt of District to Employees	\$12,862
Vehicle #1	2004 Chevy 2500 Tool Truck	\$6,000
Vehicle #2	2008 Ford F-150	\$9,935
Repair Cap		\$5,106
Chem Cap		\$6,586
<b>sub total</b>	<b>FYE 2020</b>	<b>\$50,489</b>
<b>FYE 2021 (to date)</b>		
Vehicle #3	2014 Ford F-250 Super Duty 4x4 with Snow Plow	\$15,500
<b>sub total</b>	<b>FYE 2021</b>	<b>\$15,500</b>
<b>Total</b>	<b>Expenses Paid on behalf of District by AWR</b>	<b>\$65,989</b>

Question #3: How much has the utility paid on the intake system a) 2020 calendar year; b) to present date?

**2020**

Engineering - \$26,328.40 (Note 1)

Pump, River Screen & VFD Purchase - \$294,707.70

Extra Hoses, Connectors and Clamps associated with Pump Purchase - \$15,078.55

**TOTAL - \$336,114.65**

**2021**

Engineering - \$10,337.80

Pump and Motor Repair -\$15,459.99

**TOTAL - \$25,797.79**

Note 1 - Raw Water Intake (RWI) and Water Treatment Plant (WTP) Improvements are one project. Assumes 33% of engineering cost assigned to RWI and 67% of costs assigned to WTP.

Question #4: What is the current balance of the accounts payable that is 30 days or more past due that has been accrued subsequent to the debt service surcharge approval?

Per the PSC Order dated Mar 16, 2018, page 4, \$808,209 was the District's accounts payable balance as of 12/31/2017. As of May 2021, long term vendor debt is at \$732,898. We have included a chart that may be helpful.



### Martin County Water District Outstanding Vendor Debt

