

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

**In the Matter of:
ELECTRONIC APPLICATION OF
MARTIN COUNTY WATER DISTRICT
FOR AN ALTERNATIVE RATE
ADJUSTMENT**

Case No. 2021-00154

**MARTIN COUNTY CONCERNED CITIZENS, INC.’S FIRST SET OF DATA
REQUESTS TO MARTIN COUNTY WATER DISTRICT**

Pursuant to the Public Service Commission’s (“Commission”) April 14, 2021 Scheduling Order in this matter, Martin County Concerned Citizens (“MCCC”) hereby propounds the following data requests on Martin County Water District (“MCWD” or “the district”):

1. Please provide a detailed breakdown of the “miscellaneous service revenues” listed in response to question 1 of MCCC’s first set of data requests.

2. Reference: Attachment MCCC-4: Please explain:
 - a. Is the term “penalty” synonymous with the term “late payment charge”?
 - b. Does the term “water” refer to water service for residential accounts only, or does it refer to something else? If something else, please explain what.
 - c. In Attachment MCCC-4 and Attachment 19B, please identify whether Code 100 (Water) and Code 200 (Sewer) apply exclusively to the Residential class. If not, please explain what customers are included in Revenue Code 100 and in Revenue Code 200.
 - d. Is the term “Code 100” used to refer to the same population of customers whenever and wherever it is used (e.g., comparing MCCC-4 to Attachment 19B)?

3. Please explain the relationship between the following numbers:
 - a. The “+1” balance due for “water” in the July 2020 aging report (\$112,36.47) (Attachment 19B) x a late payment charge of 10% (First Revised Tariff, Sheet No. 7) would generate a late charge of \$11,236.55. However, the “water” penalty figure reported for July 2020 was \$6,603.10 (MCCC-4). Why the difference?
 - b. The “+1” balance due for “water” in the September 2020 aging report (\$52,655.77) (Attachment 19B) x a late payment charge of 10% (First Revised Tariff, Sheet No. 7) would generate a late charge of \$5,265.58. However, the “water” penalty figure reported for September 2020 (MCCC-4) was \$6,083.10. Why the difference?

- c. In general, how do the “penalty” figures in MCCC-4 relate to the “+1” balance due figures in Attachment 19B relate one to another?
4. Confirm or deny: The 10% late payment charge included in the Water District’s Tariff would be applied only to the “+1 months” balance due identified in Attachment 19B, pursuant to 807 KAR 5:006 Sec. 9 (3)(h), which provides that a penalty may be assessed only once on any bill for rendered services. If the response to this question is anything other than an unqualified yes, please provide a detailed explanation of the basis for the response.
5. Please provide the number of current customers for which MCWD has proof of deposit for which a deposit would be returned if service were disconnected.
6. Please provide by month for each month January 2020 to present inclusive:
 - a. The number of cash security deposits newly imposed on residential accounts;
 - b. The number of cash security deposits refunded to residential accounts.
7. As of the most recent month available, please provide a distribution of residential cash security deposits held in increments of \$100 (with a reasonable top code should the Water District find a top coding to be necessary or reasonable).
8. As of the most recent month available, please provide
 - a. A distribution, in weeks, of all currently active residential deferred payment plans.
 - b. The 12-month cumulative total of nonpayment disconnections made without notice upon default of a deferred payment plan.
9. Please explain whether the Water District charges a late payment charge on balances made subject to a deferred payment plan.
10. Please describe the deferred payment plan(s) currently offered to district customers. In doing so, please assert whether the same plan is offered to all customers, and, if not, why and what alternative plans are offered.
11. In the response to MCCC-15, please provide a detailed explanation of the difference between a “certified” and a “noncertified” customer.
12. The aging reports provided in Attachment 19B were not dated. The response to MCCC-19B states that aging reports were provided for the months July 2020 through March 2021 (nine months), but 10 months of aging reports were attached. Please identify:
 - a. The month for each aging report provided in Attachment 19B; and

- b. For each month's aging report, confirm the month of the aging report by providing the "Balance" for Revenue Code "100—Water." For example, if the first month is, in fact, July 2020, identify it as follows: "July 2020: 280706.02."
13. Please describe the geographic area of the county covered by each book listed in the aging report provided as Attachment 19B to the district's response to MCCC's previous data request.
14. Page 3 of each aging report provided in Attachment 19B provides the "Selection Criteria." Page 3 of each aging report is cutoff on the left-hand side of the page so that it is not possible to read what each line states. Please provide at least one copy of the Selection Criteria" with the entire page visible.
15. Please provide, by month, for residential customers, a distribution of usage in increments of 500 gallons per month (with a top code used as reasonably determined by the Water District).
16. Please explain how the monthly rates are applied to residential consumption to determine a residential bill for a 5/8 inch meter. Provide, in sufficient detail to allow replication, a calculation of a monthly bill given the following consumption levels at current rates. Please state affirmatively whether the same rate structure applies to all meter types.:
 - a. 1,000 gallons.
 - b. 2,000 gallons.
 - c. 2001 gallons.
 - d. 2100 gallons
 - e. 2500 gallons.
 - f. 3000 gallons.
 - g. 3001 gallons.
 - h. 3100 gallons.
17. 807 KAR 5:006 Section 7(a)4 requires that the bill for service clearly show "the date of the present reading." Testimony at the hearing verified that the district does not currently include an accurate meter read date on customer's bills. Please explain what steps the district would need to take to provide an accurate meter read date on each bill.
18. How are customers billed at locations where no meter has been located? How do those customer's bills reflect their billing status, i.e., do the bills clearly show that the amount billed is not based on actual readings?

19. Please describe whether and how the district refunds or credits interest on all customer deposits in accordance with 807 KAR 5:006 Sec.8(6). How does the district determine the rate of interest paid on deposits?
20. Please explain the district's plans for repaying debt amounts not covered by the debt service surcharge.
21. For each Theft Of Water that the district has uncovered since January 1, 2020, please provide a copy of the cost calculation form and summary of findings prepared by the district and note which accounts have been forwarded to the county prosecutor. In doing so, please redact information that identifies the customer.
22. Please describe the district's process for reading the prison meter and billing PCUC. If PCUC is primarily in charge of reading the meter, please describe the district's process, if any, for verifying PCUC's reading.
23. Regarding MCWD's response to Q16 in previous data request. In response to the previous request, MCWD asserted that "all customers are set up to pay past due amounts first." The Commission's regulations provide that "[a] payment received shall first be applied to the bill for service rendered." 807 KAR 5:006 Sec. 9(3)(h)(2). Is it MCWD's position that its practice of applying payments to past due amounts first is in compliance with the Commission's regulation? Why or why not?
24. Please provide a detailed description of how the how MCWD separates unpaid bills for service in a month from unpaid Late Payment Charges from prior months in order to comply with the Commission regulation stating that "(h) Late payment charge. A late payment charge may be assessed if a customer fails to pay a bill for services by the due date shown on the customer's bill. . .3. Additional late payment charges shall not be assessed on unpaid late payment charges." (emphasis added).

Respectfully Submitted,

/s/ Mary Varson Cromer

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing initial data request was served via electronic mail to all parties in this matter on this the 10th of June 2021.

/s/ Mary Varson Cromer