

**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 POST-HEARING DATA
REQUESTS TO THE MARTIN COUNTY WATER DISTRICT**

Pursuant to the Public Service Commission's ("Commission") Order of September 27, 2021 in this matter, Martin County Concerned Citizens ("MCCC") hereby propounds the following post-hearing data requests on Martin County Water District ("MCWD" or "the district"). If you have questions regarding these requests, please contact the undersigned directly.

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.
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.
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.
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.

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.
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.")

Respectfully Submitted,

/s/ Mary Varson Cromer

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing data request was served via electronic mail to all parties in this matter on this the 27th of September 2021.

/s/ Mary Varson Cromer