

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO EXCESSIVE)	
WATER LOSS BY KENTUCKY'S)	CASE NO.
JURISDICTIONAL WATER UTILITIES)	2021-00339

**RESPONSE TO COMMISSION'S REQUEST FOR INFORMATION
DATED DECEMBER 10, 2021**

North Manchester Water Association ("NMWA") provides the following response to the Commission Request for Information issued on December 10, 2021, attached hereto as Appendix

A. The witness responsible for each response is NMWA Manager Rose Lewis.

Respectfully submitted,



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APPENDIX A

1. Provide the name of all board members for each of the five previous years and list the dates of their terms.

Response:

2016 Board Members

Luke Mathis
Johnny Dean Wolfe
Johnny Johnson
Bobby Wolfe
Charles Stivers
Tim Lunsford
Jim Mathis (left March 7, 2016)

2017 Board Members

Luke Mathis (left 2017)
Johnny Dean Wolfe
Johnny Johnson (left 2017)
Bobby Wolfe
Charles Stivers (left 2017)
Tim Lunsford (left 2017)
Steve Davis
Ted Woods
Wes Hibbard
Josephine Gross
Hugh Lunsford (left December 28, 2017)
Ken Lunsford

2018 Board Members

Steve Davis
Bobby Wolfe
Ted Woods
Wes Hibbard
Josephine Gross
Greg Hoskins
Bill Hurd

2019 Board Members

Steve Davis
Bobby Wolfe
Ted Woods
Wes Hibbard (left January 2019)
Josephine Gross (left January 2019)
Greg Hoskins
Bill Hurd
Henry Smith
Carl David Crawford

2020 Board Members

Steve Davis
Bobby Wolfe
Ted Woods
Greg Hoskins
Bill Hurd
Henry Smith
Carl David Crawford

2021 Board Members

Steve Davis
Bobby Wolfe
Ted Woods
Greg Hoskins
Bill Hurd (left March 2021)
Henry Smith
Carl David Crawford

2. Provide the name of all board members for each of the five previous years, and state, individually, the total amount of each benefit paid to, or on behalf of, each board member during each year (i.e., wages, health insurance premiums, life insurance premiums, FICA tax).

Response: NMWA's board members do not get paid or receive any benefits.

3. Provide the dates of employment for Jerry Rice.

Response: Mr. Rice was employed by NMWA from March 1, 2019 to October 18, 2019.

4. Provide the name of the individual hired to replace Jerry Rice.

Response: Jackie Jones replaced Jerry Rice as operator of the NMWA system.

5. Provide a verified response to the allegations set forth in the Commission's September 22, 2021 Order for the individual hired to replace Jerry Rice.

Response: NMWA objects to this question to the extent that it requests information from a person who is not a party to this proceeding. Notwithstanding that objection, NMWA states as follows: Following Mr. Rice's departure in October 2019, NMWA contracted with Jackie Jones to serve as a certified operator on an "as needed" basis. Bill Grey has been hired as a full-time operator and is working on obtaining appropriate certifications. Following the filing of this action, NMWA put Rose Lewis in charge of making sure all filings are reviewed monthly to make sure that no reports or deadlines are missed. Please refer to the verified statement attached as Appendix A to NMWA's response to the Commission's Order dated September 22, 2021 (filed November 12, 2021), which states:

The members had no intent of being late with any report and or filings, but due to the coronavirus pandemic and lack of normal in person training some paperwork has been delayed. The board and its workers have missed time due to the pandemic. Therefore, filings were not intentionally or maliciously late. The commission does not dispute that the report filings were late and understood that Mr. Woods had asked for an extension. As the professional responsible for the filings, the commission trusted, Mr. Ted Woods would prepare the report and meet your deadlines. He takes responsibility for the late filings as he is under contract by the commission to perform those duties of preparing and filing the reports. The board is now aware of the timing of the reports and will be more cognizant of their dates

of future filing to ensure the meeting of the deadlines and requirements of the PSC. The commission has now put Rose Lewis in charge of making sure all filings are reviewed monthly to make sure that no reports and or deadlines are missed.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION


In the Matter of:

ELECTRONIC ALLEGED FAILURE OF NORTH)	
MANCHESTER WATER ASSOCIATION, INC., ITS)	
OFFICERS, STEVE DAVIS, BILL HURD, CARL)	CASE NO.
GREGORY HOSKINS, BOBBY WOLFE, HENRY)	2021-00339
SMITH, TED WOODS, CARL DAVID CRAWFORD,)	
AND ITS MANAGER, JERRY RICE, TO COMPLY)	
WITH KRS 278.140, KRS 278.230, 807 KAR 5:006, SEC.)	
4, AND KRS 278.990)	

**CERTIFICATION OF
RESPONSE TO COMMISSION'S ORDER DATED DECEMBER 10, 2021**

This is to certify that I have supervised the preparation of North Manchester Water Association's responses to the Commission's Request for Information that was labeled as Appendix A to the Commission's Order Dated December 10, 2021 that the responses are true and accurate to the best of my knowledge, information, and belief after reasonable inquiry.

Date: 1/4/2022



Rose Lewis, NMWA Office Manager