

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

**IN THE MATTER OF:**

**ELECTRONIC INVESTIGATION INTO )  
WHOLESALE WATER RATES CHARGED BY )  
THE CITY OF CARLISLE TO SHARPSBURG )  
WATER DISTRICT AND NICHOLAS COUNTY )      **CASE NO. 2021-00382**  
WATER DISTRICT PURSUANT TO KRS 278.200, )  
KRS 278.160, KRS 278.180, KRS 278.190 AND )  
KAR 5:011 )**

**SUPPLEMENTAL RESPONSE OF THE CITY OF CARLISLE, KENTUCKY  
TO SECOND POST HEARING REQUEST FOR INFORMATION**

Come now City of Carlisle, by counsel, (City), and for its Supplemental Response to the Second Commission Staff Post Hearing Request for Information (2dPHRFI) states as follows:

Information provided herein was gathered from a number of City of Carlisle officers and employees, among them:

- a. Mayor Ronnie C. Clark;
- b. Water Superintendent Ricky L. Moore;
- c. City Clerk Treasurer Angela C. Lyons;
- d. Deputy City Clerk Treasurer Christy L. Gilvin.

As Mayor Clark is the Official Custodian of City of Carlisle records, his Jurat follows.

1. 2dPHRFI #3:

Retail Sales to others, FY 2020: 45,661,500 gallons

Retail Sales to others, FY 2021: 50,407,400 gallons

See spreadsheet attached as exhibit #24; annual number less sales to NCWD and S/BWD.

2. 2dPHRFI #4: Water loss percentage:

A number of assumptions and unmetered non-revenue water usage go into this calculation. Carlisle estimates an under billing of approximately eight (8%) percent due to old slow running and “dead” meters. This should be figured into the water loss percentage; we are not sure how but increased the “billed” volume by eight (8%). The volume of potable water produced is not

metered. It is estimated by the time the pump moving it out of the plant is run for a day and calculated from the pumping capacity of the pump in gallons a minute. The volume produced in FY 20/21 reflects an increase of over twenty two (22.45%) percent year over year, with no apparent reason. This production number may be off, if Carlisle finds it is, we will advise accordingly as soon as known. In addition to the non-revenue water used as shown in prior exhibits 14-A thru 14-G, and as answered in question #11 on page 4 of Response, an additional 4,786,400 un-metered gallons were used in FY 20/21 to backwash the city distribution system lines. This number is unavailable for FY 19/20.

Accordingly, for FY 20/21, the water loss is estimated at 28.323%.

For FY 19/20, using the next year's non-revenue water and system backwash volumes, the water loss is estimated at 14.246%.

3. 2dPHRFI #7: Carlisle is unable to answer the questions in #7 except to state that if S/BWD was not pumping water for thirty one (31) days as mentioned in the Informal Conference on 16 MAR 22, it was not because Carlisle was restricting access to its water supply for the entire time. S/BWD simply did not turn on its pump. In fairness to S/BWD, it is doubtful Carlisle informed S/B of its ability to resume pumping, or when it was restricted. This is a miscommunication issue, not a failure of Carlisle to allow withdrawal of water, although there are sometimes during that time period that it is very likely that had S/B tried, it would not have been able to draw water.

/s/ Ronnie C. Clark  
Ronnie C. Clark,  
Mayor of Carlisle

**COMMONWEALTH OF KENTUCKY  
COUNTY OF BOURBON**

The foregoing was subscribed, sworn and acknowledged before me on this 16th day of March 2022 by Ronnie C. Clark, Mayor of Carlisle, on behalf of the City of Carlisle.

/s/ Michelle M. Taylor

Michelle M. Taylor, Notary Public-State at Large  
My Commission Expires: April 22, 2025  
Notary ID # KYNP 25936  
Respectfully submitted,

/s/ Henry Watson III

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Counsel for the City of Carlisle

**CERTIFICATE OF SERVICE**

The undersigned certifies that the electronic filing has been transmitted to the Commission on March 16th, 2022, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Henry Watson III

Henry Watson III  
Counsel for the City of Carlisle