

**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)	

**RESPONSE OF THE CITY OF CARLISLE, KENTUCKY
TO REQUESTS FOR INFORMATION IN PSC ORDER OF 25 OCT 2021**

* * * * *

Comes now City of Carlisle, by counsel, (City), and submits the following in Response to Requests for Information in PSC Order entered 25 OCT 2021. All Exhibits are attached hereto and incorporated herein by reference,

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. Gary Osborne, WTP Operator
- d. City Clerk Treasurer Angela C. Lyons;
- e. Deputy City Clerk Treasurer Christy L. Gilvin;

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

- 1. Response to PSC Request for Information (RFI) #1:
Carlisle Exhibit 10-A-1 for Meter 290 to NCWD.
Carlisle Exhibit 10-A-2 for Meter 300 to NCWD
Carlisle Exhibit 10-A-3 for Meter 320 to NCWD.
Carlisle Exhibit 10-A-4 for Meter 330 to NCWD.
Carlisle Exhibit 10-B for Meter 350 to S/BWD.

- 2. Response to PSC RFI #2:
Carlisle stipulates as it did during the Hearing of 17 DEC 2021 that any difference between rates charged is due to Carlisle Ordinance #2-2005, its Exhibit 5 to its Response

filed 9 NOV, adjusting wholesale rates by the change in the CPI year-to-year on 1 JUL in 2019 and thereafter annually. CPI attached as Exhibit #11; (irrelevant years omitted.)

3. Response to PSC RFI #3:

- a.) Only wholesale customers are parties hereto, to wit: NCWD and S/BWD.
- b.) Carlisle Exhibit #12-A-1: NCWD account meter 00290;
- c.) Carlisle Exhibit #12-A-2: NCWD account meter 00300;
- d.) Carlisle Exhibit #12-A-3: NCWD account meter 00320;
- e.) Carlisle Exhibit #12-A-4: NCWD account meter 00330;
- f.) Carlisle Exhibit #12-B: S/BWD account meter 00350;

4. Response to PSC RFI #4: No COSS conducted.

5. Response to PSC RFI #5: Mayor Clark testified to this at the zoom hearing 17 DEC 2021; cost increases for chemicals; hours to run the plant to meet demand at hourly rate of employee's salary; increase in prices for meters, valves, pipe, fuel, other consumables; increase in equipment maintenance costs and use of equipment.

6. Response to PSC RFI #6: Ricky Moore compiled the following analysis. Carlisle produced 249,104,000 gallons of potable finished water in FY 1 JUL 2020 to 30 JUN 2021; produced 24,910 1m gal units; Total water production costs were \$650,029.00; cost per 1m gal unit equals \$2.61; cost per gallon equals \$0.0261.

7. Response to PSC RFI #7: Mayor's current term in office, 1 Jan 2019 to date.

8. Response to PSC RFI #8: Included in Response to PSC RFI #9, following.

9. Response to PSC RFI #9:

- a.) Carlisle Exhibit #13-A for FY 2018;
- b.) Carlisle Exhibit #13-B for FY 2019;
- c.) Carlisle Exhibit #13-C for FY 2020;

10. Response to PSC RFI #10:

a.)-1. NCWD uses four (4) master meters: 290, 300, 320, and 330, corresponding to usage and billing records in Exhibits 10A-1 through 10A-4, and 12A-1 through 12A-4.

a.)-2 S/BWD uses a single meter, 350, corresponding to usage and billing records, Exhibits 10-B and 12B.

b.) Ownership, operation, and maintenance is per the Water Purchase Agreements:

b.)-1 NCWD meters are set out in Paragraph 2. A. through 2. F., Appendix B. to PSC Order in this Case, with those in A. and C. no longer operable or in service.

b.)-1 a. Ownership under the agreement is unclear but appears to be in the NCWD.

b.)-1 b & c. Operation and maintenance are to be by and at the expense of NCWD.

b.)-2 S/BWD meter is set out in Paragraph 4. of the Water Purchase Agreement, Exhibit 9 to its Response filed 9 NOV 2021.

b.)-2 a, b. & c.: Ownership, operation, and maintenance are to be by and at the expense of the City of Carlisle.

11. A. Response to PSC RFI #11: Yes.

a.) Carlisle City Hall/Police DPT: Exhibit #14-A

b.) Carlisle Vol. Fire DPT: Exhibit #14-B

c.) Carlisle City Barn: Exhibit #14-C

d.) Carlisle Wastewater Tr. Plant: Exhibit #14-D

e.) Carlisle Water Tr. Plant: Exhibit #14-E

f.) Carlisle Water Tr. Plant Filter Room: Exhibit #14-F

g.) Carlisle Water Tr. Plant Bathroom at Lake: Exhibit #14-G

h.) Nicholas County Vol Fire DPT keep records of water used but not billed but these records were lost in the recent flood of AUG 2021; estimate twice (2X) City Vol. Fire DPT usage, EXH 14-B above, and filling trucks, below.

i.) Flushing City Hydrants: 2020: 9,040,000; 2021: 9,968,000;

j.) Filling City fire truck tanks for training and firefighting:

2019: 35,000; 2020: 25,000; 2021: 30,000;

k.) Water loss thru breaks: 2021: Mains: 450,000; SVC lines: 50,000

Total loss: 500,000.

11. B. Used total potable water production for FY 2020-2021 noted in Para #6 above, RFI #6, *i.e.*, 294,104,000 and extrapolated figures from calendar years converted to FY for the same period for estimate of percentage requested:

City Hall/Police DPT: 74,600

City Fire DPT 700

Tanks and Firefighting:	27,500
Hydrant Flushing:	9,504,000
City Barn:	29,800
City WWTP:	4,961,900
Water Treatment Plant:	2,253,400
WTP, Filter Room:	3,325,200
Bathroom, WTP Lake:	8,300
Backwash WTP: est	5,059,800
Nicholas County V FD: est:	1,400
Tanks and Firefighting: est:	55,000
Loss from Breaks:	<u>500,000</u>
TOTAL FOR	
UNBILLED USAGE:	25,801,600
Less water needed to	
Produce potable water:	
WTP:	2,253,400
WTP, Filter Room:	3,325,200
Bathroom:	8,300
Backwash WTP:	5,059,800
TOTAL REDUCTION:	10,646,700
GRAND TOTAL	
UNBILLED:	15,154,900
PERCENTAGE REQUESTED:	.051

12. Response to PSC RFI #12: Excel .Spreadsheet provided:
Carlisle Exhibit 15: NCWD and S/BWD;
NCWD annual increase of \$32,843.59;
S/BWD annual increase \$11,058.60;
Total annual increase to City of Carlisle: \$43,902.25.
- 13 Response to PSC RFI #13:
Carlisle Exhibit 16-A: Resolution 2021-3;
Carlisle Exhibit 16-B: Ordinance 2021-6;

- 14: Response to PSC RFI #14:
Carlisle Exhibit 17-A: 8 MAY 2017
Carlisle Exhibit 17-B: 7 JAN 2019
Carlisle Exhibit 17-C: 8 MAR 2021
Carlisle Exhibit 17-D: 12 JUL 2021
Carlisle Exhibit 17-E: 9 AUG 2021
Carlisle Exhibit 17-F: 13 DEC 2021

15. Response to PSC RFI #15:

Carlisle is aware of no written or e traffic directed from City of Carlisle to or from either NCWD or S/BWD not already in the record in this matter, to wit:

- PSC Order App A;
PSC Order App E;
Carlisle Response Exh. 2;
Carlisle Response Exh, 3;

/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 14th day of January 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

Based on its Response as Supplemented with the information and Exhibits filed herewith, it is respectfully requested that the PSC Order that the Tariff filed by the City of Carlisle, which is the subject matter of this case, be filed effective on the date filed.

Respectfully submitted,

/s/ Henry Watson III

Henry Watson III (KBA #74830)

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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 January 14, 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