COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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IN THE MATTER OF:

ELECTRONIC INVESTIGATION INTO WHOLESALE WATER RATES CHARGED BY THE CITY OF CARLISLE TO SHARPSBURG WATER DISTRICK AND NICHOLAS COUNTY WATER DISTRICT PURSUANTTO KRS 278.200, KRS 278.160, KRS 278.180, KRS 278.190 AND KAR 5:011

CASE NO. 2021-00382

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

Come now City of Carlisle, by counsel, (City), and for its Response to the Commission Staff Post Hearing Request for Information (PHRFI) 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. PHRFI 1, 2, 3 and 4: Rates and Terms of Service changes since 1989:
 - a. Nicholas County Water District:
 - 1.) Ordinance 3-1992, EXH 7 to Response to 25 OCT Order of PSC;
 - Water Purchase Agreement 25 JAN 1993, App. B to PSC Order of 20 OCT 2021.
 - 3.) Tariff, App. C, to PSC Order of 20 OCT 2021, current rates.
 - b. Sharpsburg Water District:
 - 1.) Ordinance 3-1992, EXH 7 to Response to 25 OCT Order of PSC;
 - 2.) Resolution 6-1995, 10 APR 1995, attached as PHRFI EXH 18.
 - 3.) Amendment to Water Purchase Agreement10 MAY 1995, attached as PHRFI EXH 19.

4.) Tariff, App. C, to PSC Order of 20 OCT 2021, reflect current rates.

2. RFI 5: All bills to NCWD and S/BWD since 2020:

This request cannot be met. The computer billing system used by the City of Carlisle prints a post card size monthly bill per account (by meter) that cannot be re-printed. Each monthly bill appears sequentially on a Carlisle History Billing Register per account that is in the Record of this case for each of the four (4) NCWD Meters and the sole S/BWD meter:

- a. Carlisle Exhibit 10-A-1 for Meter 290 to NCWD.
- b. Carlisle Exhibit 10-A-2 for Meter 300 to NCWD
- c. Carlisle Exhibit 10-A-3 for Meter 320 to NCWD.
- d. Carlisle Exhibit 10-A-4 for Meter 330 to NCWD.
- e. Carlisle Exhibit 10-B for Meter 350 to S/BWD.

6. No audits were performed specific to the water production and distribution systems of the City of Carlisle. City of Carlisle Audits for FY 2018/2019 and FY 2019/20 have been provided and are in the Record of this case: Exhibits . Included herewith as Exhibits are City of Carlisle Audits for FY 2015-16, FY 2016-17, and FY 2017-18, Exhibits PHRFI 20, 21, and 22.

7. PHRFI 7 answered in Response to RFI 11, para 11B of Carlisle's Response to RFI in PSC Order of 25 OCT 2021, although we just realized nowhere is reflected Carlisle's sale of water to its retail customers, skewing this number. This will be supplemented when the retail sales data for FY 20/21 is known and received.

<u>/s/ Ronnie C. Clark</u> Ronnie C. Clark, Mayor of Carlisle

COMMONWEALTH OF KENTUCKY COUNTY OF BOURBON

The foregoing was subscribed, sworn and acknowledged before me on this 24th day of

January 2022 by Ronnie C. Clark, Mayor of Carlisle, on behalf of the City of Carlisle.

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

/s/ Henry Watson III Henry Watson III (KBA #74830) Watson Law Firm, PLLC 525 High Street, Suite 325 Paris, Kentucky 40361 Telephone: 859.987.6525 hwatson3@earthlink.net Counsel for the City of Carlisle

CERTIFICATE OF SERVICE

The undersigned certifies that the electronic filing has been transmitted to the Commission on January 24, 2022, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

<u>/s/ Henry Watson III</u> Henry Watson III Counsel for the City of Carlisle