

**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 SECOND POST HEARING REQUEST FOR INFORMATION**

Come now City of Carlisle, by counsel, (City), and for its 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.

City of Carlisle does not agree with the conclusion in the PSC Order of 10 MAR 2022, that it has failed to provide answers to three (3) rounds of Requests for Information from the PSC. The initial data dump requested took a very long time to assemble, as counsel has explained, experienced PSC counsel could not be retained given the extremely short timeline set by the PSC, and accordingly, undersigned counsel to the City of Carlisle has had to muddle through.

The First Post Hearing RFI was answered on time IAW the PSC Order.

In general, most of the data requested in the Second Post Hearing RFI has been provided earlier, as will be demonstrated herein.

1. 2dPHRFI #1: Revenue per meter is in Exhibits 10-A-1 thru 10-A-4 for NCWD; to obtain total revenues, it is simply necessary to add the "Service Amount" column revenues for each meter for the applicable FY, and then add the four (4) numbers for each FY:

NCWD FY 2020: \$96,441.07
NCWD FY 2021: \$102,057.37

2. 2dPHRFI #1a: Late payments are calculated as set out above, using the same Exhibit's "Penalty" column rather than the "Service Amount" column:

NCWD FY 2020: \$3,874.10
NCWD FY 2021: \$7,530.76

3. 2dPHRFI #1b: Other charges are E-911 Fees: \$24.00

4. 2dPHRFI #2: Revenue per meter is in Exhibit 10-B for S/BWD; calculated as set out above which results in a single number for S/BWD as it uses only a single meter:

S/BWD FY 2020: \$34,598.09
S/BWD FY 2021: \$35,345.84

5. 2dPHRFI #2a: Late payments are calculated as set out above, using the same Exhibit's "Penalty" column rather than the "Service Amount" column:

S/BWD FY 2020: None
S/BWD FY 2021: None

6. 2dPHRFI #2b: Other charges are e-911 FEES: \$24.00

7. 2dPHRFI #3: Volume per meter is in Exhibits 10-A-1 thru 10-A-4 for NCWD; to obtain total volumes, it is simply necessary to add the "Usage" column gallons for each meter for the applicable FY, and then add the four (4) numbers for each FY:

NCWD FY 2020: 65,046,700
NCWD FY 2021: 64,418,300

Volume per meter is in Exhibit 10-B for S/BWD; to obtain total volumes, it is simply necessary to add the "Usage" column gallons for the sole meter for the applicable FY:

S/BWD FY 2020: 22,492,90
S/BWD FY 2021: 22,174,400

Carlisle admits it has not previously provided volumes sold to “other” customers:
Retail Sales to others, FY 2020: to be supplemented IAW 10 MAR Order.

Retail Sales to others, FY 2021: to be supplemented IAW 10 MAR Order.

8. 2dPHRFI #4: Water loss percentage: to be supplemented IAW 10 MAR Order.
9. 2dPHRFI #5: Depreciation schedule uploaded separately as Exhibit 2dPHRFI #23.
10. 2dPHRFI #6a: Asked and answered in earlier response to RFI. Carlisle applied its Cost of Living Adjustment annually per City Ordinance.
11. 2dPHRFI #6b: Asked and answered in earlier response to RFI. Carlisle applied its Cost of Living Adjustment annually per City Ordinance.
12. 2dPHRFI #6c: Asked and answered in earlier response to RFI. Carlisle applied its Cost of Living Adjustment annually per City Ordinance.
13. 2dPHRFI #6d: Attached as Exhibits 10-A-1 Suppl, 10-A-2 Suppl, 10-A-3 Suppl, 10-A-4 Suppl, and 10-B Suppl.
14. 2dPHRFI #6e: Rates charged are those in the tariff plus the annual COLA, as above.
15. 2dPHRFI #7: to be supplemented IAW 10 MAR Order.
16. 2dPHRFI #7a: to be supplemented IAW 10 MAR Order.
17. 2dPHRFI #7b: to be supplemented IAW 10 MAR Order.
18. 2dPHRFI #7c: to be supplemented IAW 10 MAR Order.

/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