COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:		
ELECTRONIC PURCHASED WATER ADJUSTMENT FILING OF BATH COUNTY WATER DISTRICT)	CASE NO. 2022-00067

RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO BATH COUNTY WATER DISTRICT DATED JULY 28TH, 2022

Respectfully submitted,

Earl Rogers III

Campbell Rogers & Stacy, PLLC

Attorneys at Law

154 Flemingsburg Road

Morehead, KY 40351

Telephone: (606) 783-1012

Fax: (606) 784-8926

earl@campbellrogers.com

Counsel for Bath County Water District

CERTIFICATE OF SERVICE

The undersigned certifies that the electronic filing has been transmitted to the Commission on August 2nd, 2022; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

Earl Rogers III

Counsel for Bath County Water District

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN	THE	NAA	TTE	R OF:
11.76		IVE A		26 4 321

ELECTRONIC PURCHASED WATER)	
ADJUSTMENT FILING OF BATH COUNTY)	CASE NO. 2022-00067
WATER DISTRICT)	

CERTIFICATE

Sarah Price, being duly sworn, states that she has supervised the preparation of the responses of Bath County Water District to the Commission Staff's First Request for Information in the above-referenced case dated July 28th, 2022, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry

Subscribed and sworn before me on this the day of August, 2022.

Notary Public ID#: KYNP 2(92) 9
Commission Expires: 1/19(25

BATH COUNTY WATER DISTRICT **PSC CASE NO. 2022-00067**

FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S REQUEST FOR INFORMATION DATED 7/28/2022

RESPONSIBLE PERSON: Sarah Price

COMPANY: Bath County Water District

REQUEST 1: Provide the date that Bath County Water District began working on the application

for an alternative rate adjustment pursuant to 807 KAR 5:076.

RESPONSE 1: June 27th, 2022.

REQUEST 2: Provide in detail the amount of progress made on the application prior to engaging

Kentucky Engineering Group to assist in preparing the rate case.

RESPONSE 2: On April 25th, 2022 Bath County Water District began an application for a

Kentucky Infrastructure Authority KIA loan with the assistance of Gateway Area Development

District GADD. It was mine and the District's understanding that the financial analysis performed

by GADD for the KIA loan would be adequate for use in the application for alternative rate

adjustment. However, over the course of the next month GADD made no progress and there was

no clear answer as to when the financial analysis would be complete. At the next meeting, May

23rd, the District instructed me to seek another resource to assist with the application. At the

following meeting, June 27th, Kentucky Engineering Group was hired.

REQUEST 3: Provide the date that Bath District first contacted Kentucky Engineering Group to

assist with the application.

RESPONSE 3: Bath County Water District first contacted Kentucky Engineering Group on June

27th, 2022 to assist with the application.

REQUEST 4: Provide the date that the former Bath District General Manager retired.

RESPONSE 4: The former Bath County Water District Manager retired May 31, 2022.

REQUEST 5: Provide the date that the new Bath District General Manager was hired.

RESPONSE 5: The current Bath County Water District Manager, Sarah Price, was hired January 13th, 2022.