

Case No. 2022-00147
Water Service Corporation of Kentucky
Responses to City of Clinton First Request for Information

City of Clinton DR 1-1:

At a meeting held at City Hall, a representative of Water Services Corporation of Kentucky, stated that Water Services Corporation of Kentucky would be replacing one (1) mile of water pipe within the City each year. Please document the miles of water pipe that have been replaced since that meeting.

Response: WSCK objects to this question as it is vague. WSCK previously proposed to replace one mile of water mains annually in Kentucky as a part of a Qualified Infrastructure Program (“QIP”). The QIP mechanism was denied by the Commission in Case No. 2020-00160.

Witness: Legal; Seth Whitney

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City of Clinton DR 1-2:

Water Services Corporation of Kentucky has not completed repair projects in the City of Clinton. For each of the locations following, please state the reason for the delay in completion, the person or persons responsible for completing the work, the date of anticipated completion.

- A. Ezell Lane:
- B. College Street:
- C. Barclay Street:
- D. Barnt driveway - Ezell Lane - customer complaint March 2022
- E. Clinton Apartments - street repair

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals. Without waiving the foregoing objection, WSCK states as follows: All water repairs have been completed for the referenced projects. All street repairs have been completed or have been assigned to a contractor for repair. WSCK does not have any record of Barclay Street needing repair.

Witness: Legal; Colby Wilson

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City of Clinton DR 1-3:

In response to AG DR 1-9, Water Services of Kentucky responded that it provides monthly reports to the City of Clinton. Clinton receives two reports monthly and it is unclear which report is in response to the question and that the City of Clinton uses the reports to prepare wastewater billing. Please provide copies of the report referred to in this Response.

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals. Without waiving the foregoing objection, WSCK states as follows: The “Clinton Usage WW Report” Excel file provided monthly is the final report once all re-reads and other adjustments have taken place. The notebook read file provided contains the raw meter read data before any investigation, corrections, or adjustments have been completed. The City is already in possession of these files.

Witness: Legal; Colby Wilson

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City of Clinton DR 1-4:

Please explain why two reports for the same customers that differ extensively are sent to the city each month. Which report does Water Services of Kentucky intend to be the correct report for use in preparing wastewater billing.

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals. Without waiving the foregoing objection, WSCK states as follows: The “Clinton Usage WW Report” provided monthly is the final water billing report. The notebook read file provided contains the raw meter read data before any investigation, corrections, or adjustments have been completed.

Witness: Legal; Colby Wilson

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City of Clinton DR 1-5:

The City of Clinton utilized a grant to purchase the meters currently in use in Clinton. It is the position of the City of Clinton that the meters belong to the city. Is that the understanding of Water Services Corporation of Kentucky?

A. If allowed to replace the current meters, will Clinton be reimbursed for meters that are removed?

B. If the ownership of the meters is disputed, please explain the rationale for Water Services Corporation of Kentucky claiming ownership of the current meters.

Response: The Company confirms that to its knowledge, the City of Clinton is the owner of the current meters.

A. To the Company's knowledge, and as confirmed in this question, the City of Clinton utilized a grant to purchase the current meters, which are at the end of their useful life. WSCK is willing to provide the removed meters to the City of Clinton if requested by the City.

B. Not applicable; see above.

Witness: James Kilbane

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City of Clinton DR 1-6:

Please explain how advanced metering will be of assistance to the water customer in Clinton.

Response: Please see Direct Testimony of Colby Wilson, pages 9-12.

Witness: Colby Wilson

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City of Clinton DR 1-7:

If allowed to install advanced metering, how will that affect sharing usage information with the City of Clinton?

Response: No changes are anticipated.

Witness: Colby Wilson

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City of Clinton DR 1-8:

If there are plans for replacement of the aging water lines in the City of Clinton, please share those plans and the person tasked with completing replacement.

Response: Please see Direct Testimony of Colby Wilson, page 8.

Witness: Colby Wilson

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City of Clinton DR 1-9:

If there are plans to extend water lines farther beyond the boundaries of Clinton than already are in existence, please provide those plans and the person tasked with overseeing expansion of the water system.

Response: No requests have been filed pursuant to WSCK's tariff. Therefore, there are no plans for expansion. WSCK will comply with legal requirements regarding the provision of water service to new customers.

Witness: Colby Wilson

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City of Clinton DR 1-10:

In response to AG DR 1-10, the number of customers in Clinton was stated to be 572.

Has the number of customers increased or reduced since the last two water rate increases in 2018 and 2020?

- A. Provide the number of customers in 2018.
- B. Provide the number of customers in 2019.
- C. Provide the number of customers in 2020.
- D. Provide the number of customers in 2021.
- E. Provide the number of customers in 2022.

Response:

- A. As of 12/31/2018: 567
- B. As of 12/31/2019: 565
- C. As of 12/31/2020: 564
- D. As of 12/31/2021: 575
- E. Please refer to WSCK's response to AG DR 1-010. As of 06/30/2022: 572

Witness: James Kilbane

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City of Clinton DR 1-11:

In the previous case, 2020-00160, in response to the submitted testimony of Shannon Payne, Stephen Vaughn testified that the water offices were closed because of pandemic restrictions. The office remains closed to the public with doors locked.

- A. When does the Company intend to reopen the office to the public?
- B. There is a drop box for payments. Cash payments are not accepted. When does the Company plan to accept cash payments?
- C. How often do company employees check the drop box for payments?
- D. How long is the average time from payment to recording of Clinton water resident payments?
- E. Have Clinton customers received cut-offs or late notices because their payment has not been processed?
- F. City employees collected water bill payments until March 1, 2022. Since the City no longer collects water payments, has the company made an effort to find a third party to collect water bill payments? If so, who has been contacted and why has no one been employed to provide that service?

Response: A. With current staffing, the WSCK Clinton office is not regularly open to the public. At this time, WSCK does not plan on increasing the staff in Clinton in order to have a public office.

B. The Company has no plans to accept cash payments.

C. The drop box is checked periodically and at least twice each business day.

D. The payments are recorded at the end of each business day.

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E. No.

F. Yes, several local businesses were approached by WSCK representatives, and all declined.

They included a hardware store, banks, as well as the local newspaper.

Witness: Colby Wilson

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City of Clinton DR 1-12:

What is the mechanism if a Clinton water customer has an issue with water service?

A. What are the channels for handling a customer complaint?

B. Tracey Pirtle of Barclay St. has complained about water pressure issues. What is being done to address her complaint?

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals. Without waiving the foregoing objection, WSCK states as follows:

A. Customers with any questions about their water service should contact our Customer Care team via mail, phone, e-mail or the MyUtility Connect app.

B. There is no record of the referenced complaint.

Witness: Legal; Colby Wilson

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City of Clinton DR 1-13:

It was discovered by fire department personnel on or about May 17, 2022, that the hydrant located on Moss Drive behind Intermediate Care Facility, a nursing home in Clinton, was shut off.

- A. Has that issue been corrected?
- B. When was it addressed?
- C. Provide the documentation related to the issue above.
- D. Is it true that the hydrant had been shut off for six months?

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals. Without waiving the foregoing objection, WSCK states as follows:

- A. The noted hydrant has not been valved off.
- B. Once informed of an issue, WSCK employees flowed the hydrant to assure proper working order. Rogers Hydrant Service was contacted, and they also operated and flowed the hydrant and assured it was in working condition.
- C. See attachment Clinton DR1-13 - Flow Test Letter.
- D. No, that is not true.

Witness: Legal; Colby Wilson

August 19, 2022

To whom it may concern,

We, Rogers Hydrant Service, Inc., have been in contract with Water Service Corp of Kentucky for the system located in Clinton, KY since 2019. Under this contract, we flow test the hydrants every 4th year.

The hydrant located at the corner of Moss Drive & Clayton Drive was flow tested as follows:

March 19, 2019: Actual flow tested at 650 GPM.

April 5, 2022: Actual flow tested at 650 GPM.

On or about the date of 18 May, Community Utilities of Kentucky reached out to us about flow testing the hydrant located at the corner of Moss Drive & Clayton Drive. On or about June 2, 2022, we tested this hydrant again and the actual flow tested at 650 GPM.

Respectfully,

Joey Cherry



General Manager

Rogers Hydrant Service, Inc.

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City of Clinton DR 1-14:

Several hydrants in Clinton have been designated not for use by the Clinton Fire Department.

A. Provide a map and a list of the hydrants available for use by the Clinton Fire Department.

B. Provide a list and a map of those hydrants designated not to be used by the Clinton Fire Department.

C. Provide the plan to provide additional hydrants to protect property presently not protected under 14 (B).

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals. Without waiving the foregoing objection, WSCK states as follows:

A. A list was previously provided to the Clinton Fire Department.

B. List with latitude and longitude and pictures were provided to Clinton Fire Department.

C. No plan exists currently.

Witness: Legal; Colby Wilson

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City of Clinton DR 1-15:

Hydrants were to be repainted to reflect whether they could or could not be used by the Clinton Fire Department or other fire responders.

- A. How many of the hydrants been repainted?
- B. If not all repainted to designate their status, how many have not?
- C. What is the timeline to complete that work?

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals. Without waiving the foregoing objection, WSCK states that all hydrants have been painted as their operational status designates. Regular maintenance of the hydrants is ongoing.

Witness: Legal; Colby Wilson

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City of Clinton DR 1-16:

Has the leak in the Garan building on Highway 51 been dealt with? If so, when was it repaired?

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals. Without waiving the foregoing objection, WSCK states as follows:

There is no active customer of WSCK at this location and the location is valved off.

Witness: Legal; Colby Wilson

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City of Clinton DR 1-17:

The City of Clinton received a printed out letter on August 11, 2022, dated August 2, 2022, from the Division of Water of an email to Chris Cannon with Water Services Corp. The letter stated the City of Clinton had not filed a plan for infrastructure at wastewater plant since 2018. Management of the wastewater system was being provided by Water Services Corporation of Kentucky. Why are communications not delivered or forwarded to the City of Clinton in a timely manner?

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals. Without waiving the foregoing objection, WSCK states as follows: The City of Clinton's mayor was also included on the email chain from the Division of Water. WSCK employees hand delivered a copy of this email as courtesy to City of Clinton employees.

Witness: Legal; Colby Wilson

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City of Clinton DR 1-18:

The letter referenced in Question # 17 was sent by the Division of Water eight months after the City of Clinton took over control of the wastewater system. What steps has Water Service Corporation of Kentucky taken to notify the Division of Water that it is no longer the manager of Clinton's wastewater system.

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals. Without waiving the foregoing objection, WSCK states as follows: The Division of Water was notified in December 2021 and was aware of the change in management. As the new system managers, the City of Clinton should have also confirmed the change with the Division of Water and provided its desired contact information.

Witness: Legal; Colby Wilson

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City of Clinton DR 1-19:

For what price would Water Service Corporation of Kentucky sell the Clinton water system?

Response: WSCK objects to this question because the subject matter is not relevant to the determination of requested approvals.

Witness: Legal

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City of Clinton DR 1-20:

Explain the benefit of advanced metering. What additional cost will advanced metering be to Clinton water customers?

- A. To the residential Clinton water customer.
- B. To larger users like Hickman County School District.
- C. Will fewer water company employees be needed in Clinton if advanced metering

is granted by the PSC?

Response: Please see Direct Testimony of Colby Wilson, pages 9-12.

Witness: Colby Wilson

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City of Clinton DR 1-21:

Water customers in Clinton receive their bills from a return address in Altamonte Springs, Florida. Payments sent by mail go to Philadelphia Pennsylvania. A Google search shows the corporate address to be Chicago Illinois.

- A. Are there Water Service Corporation employees at each location who handle specific customer complaints?
- B. In what office are customer complaints received?
- C. What is the process of getting customer service issues from those receiving the notice to repairpersons?

Response:

- a. Customer complaints are handled by WSCK's Customer Service Representatives (CSR). CSR's are in multiple locations throughout the United States.
- b. Written complaints are received in Altamonte Springs, FL.
- c. Once a customer service issue is received, CSRs generate a Field Activity (FA) through the Customer Care & Billing (CC&B) System which is integrated with the Operators' work order system.

Witness: Colby Wilson

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City of Clinton DR 1-22:

If advanced metering is granted and installed, how will this affect customer complaints on issues like leaks and overbilling?

Response: Please see Direct Testimony of Colby Wilson, pages 9-12.

Witness: Colby Wilson

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City of Clinton DR 1-23:

In the past, exceptions were made for leaks and pool fillings, will those exceptions be unavailable with deployed advanced metering infrastructure?

Response: No changes to the leak-adjustment policy are planned. With respect to the pool filling policy, this would only impact the sewer operations which are operated by the City. With respect to the adjustment for pool fillings, it was historically applied as a credit to the sewer bill, which is governed by City policies and procedures.

Witness: Colby Wilson

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:)
Electronic Application of Water Service) **Case No. 2022-00147**
Corporation of Kentucky for a General)
Adjustment in Existing Rates and a Certificate)
of Public Convenience and Necessity to Deploy)
Advanced Metering Infrastructure and Approval)
of Certain Regulatory Accounting Treatment)

CERTIFICATION

This is to certify that I have supervised the preparation of Water Service Corporation of Kentucky's supplemental responses to the Public Service Commission's Third Data Request and the City of Clinton's First Data Request and that the responses to both requests are true and accurate to the best of my knowledge, information, and belief after reasonable inquiry.

Date: 09/01/2022



James Kilbane
Manager of Financial Planning and Analysis
Cleveland Thermal Energy Corporation