

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-1:**

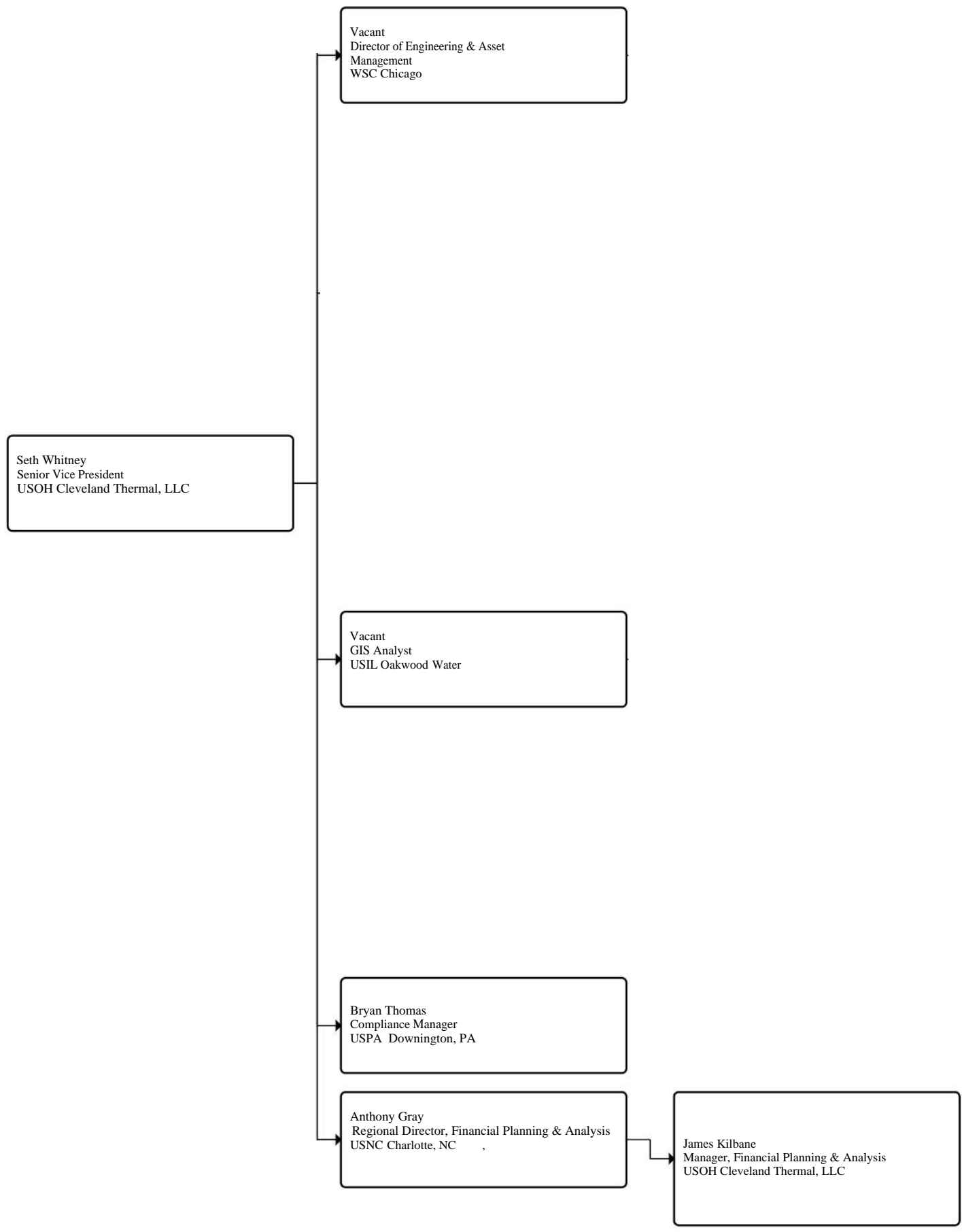
Refer to Water Service Kentucky's response to the Attorney General's First Request for Information ("Attorney General's First Request"), Item 1(a). Due to the recent personnel changes, provide an updated organizational chart of Water Service Kentucky, and designate whether each position is based in Kentucky or elsewhere.

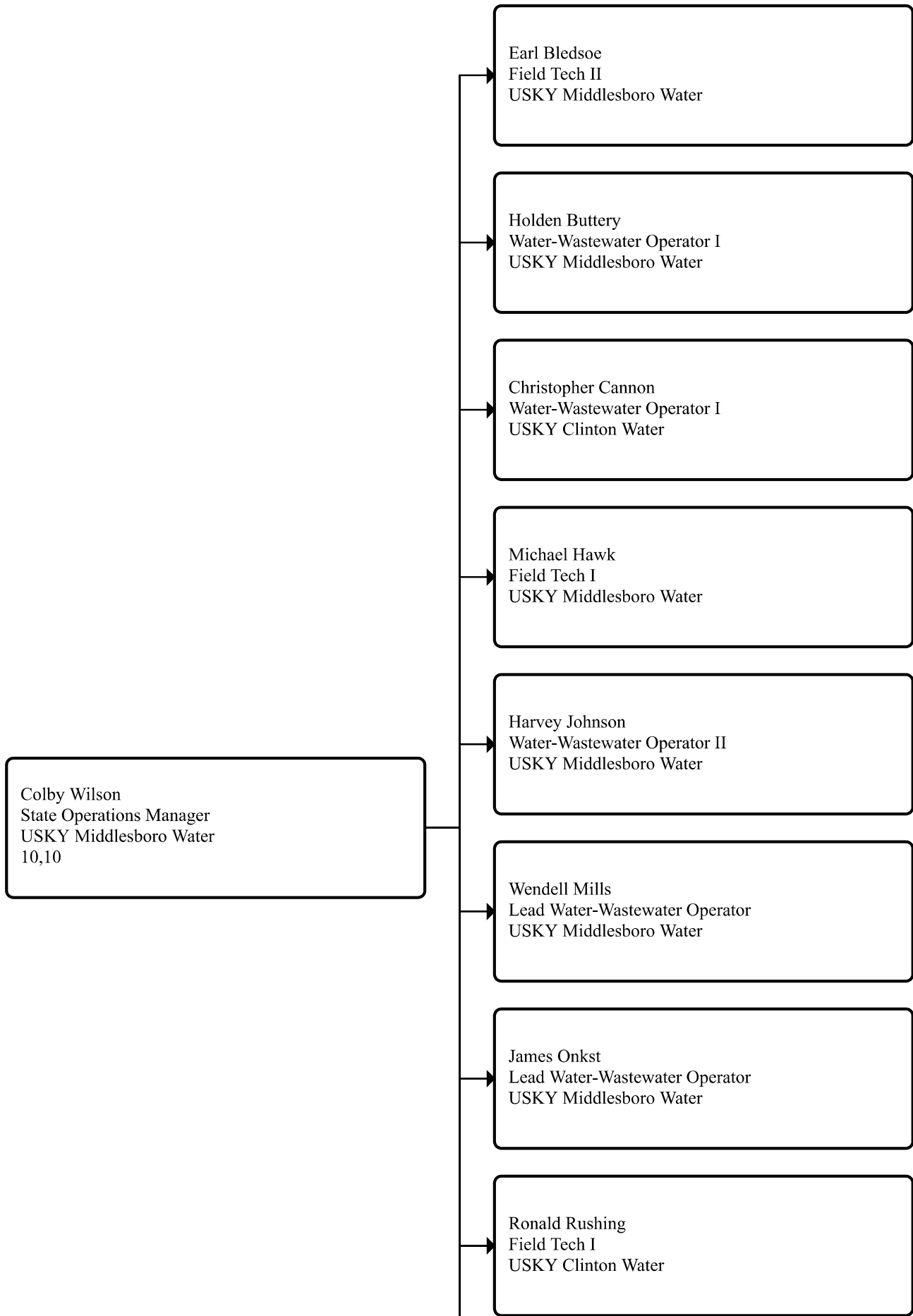
**Response:**

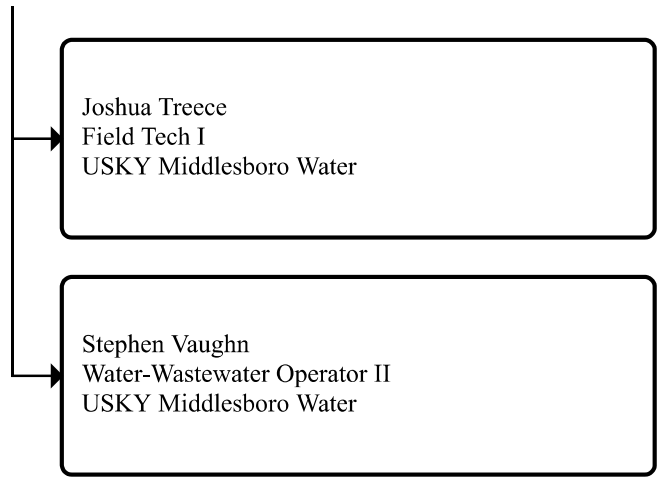
Please see attached file. The positions under Colby Wilson and including Colby Wilson are based within the state of Kentucky, and all other positions are currently based elsewhere.

**Witness:**

James Kilbane









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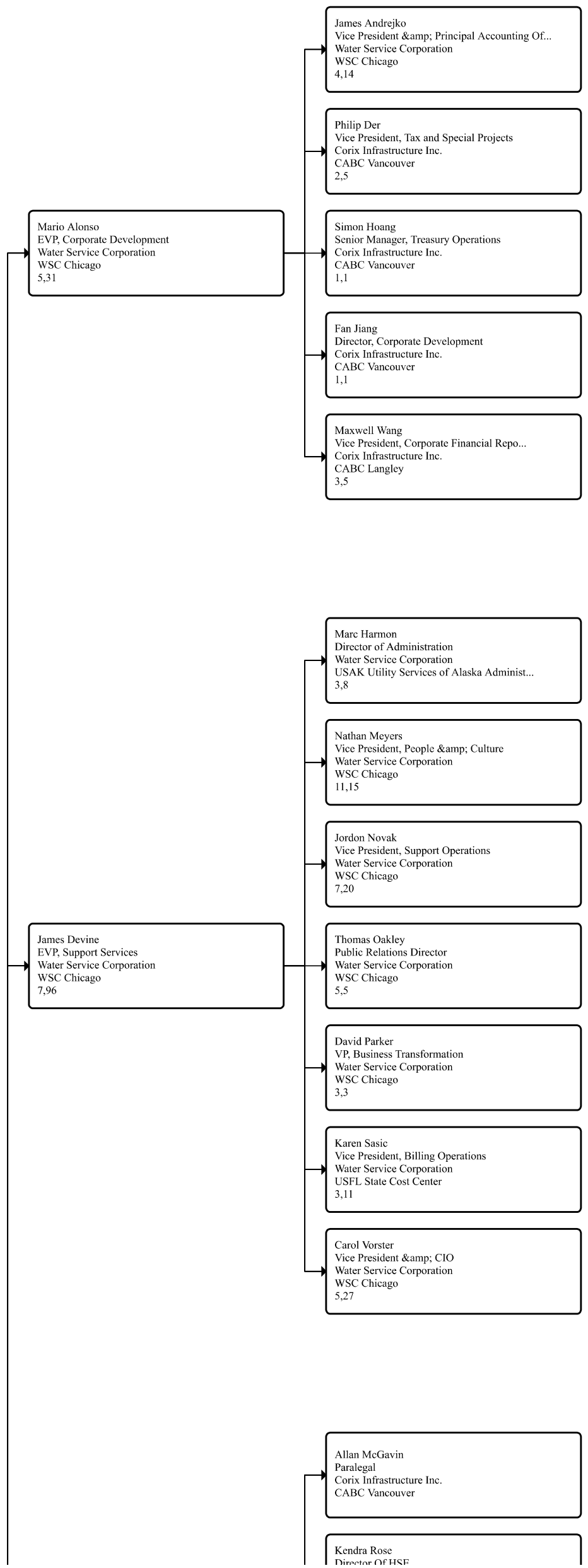
**AG DR 2-2:**

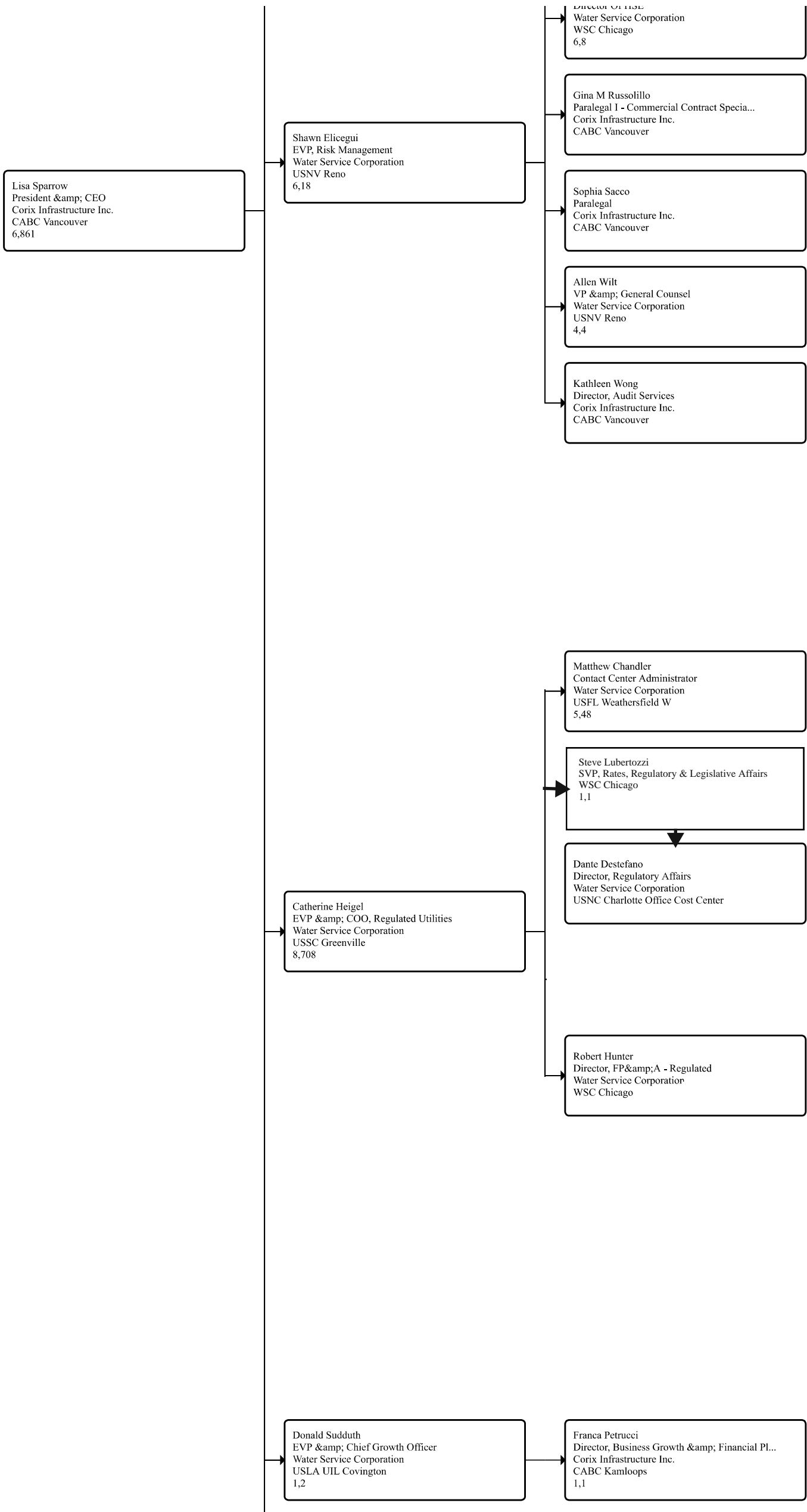
Refer to Water Service Kentucky's response to the Attorney General's First Request, Items 1(b) – (e). Due to the recent personnel changes, provide an updated organizational chart for each entity, and designate whether each position is based in Kentucky or elsewhere. For each organizational chart, provide the full name of the company instead of abbreviations for the company.

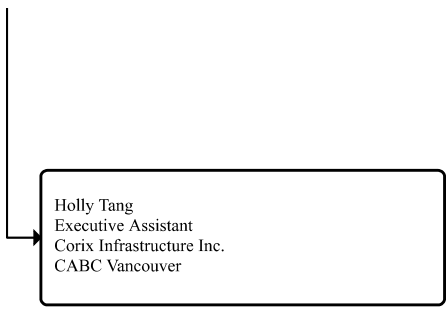
**Response:** Please see attached file. All other organizational charts are the same as what was provided in response to AG DR 1-1, parts b through e.

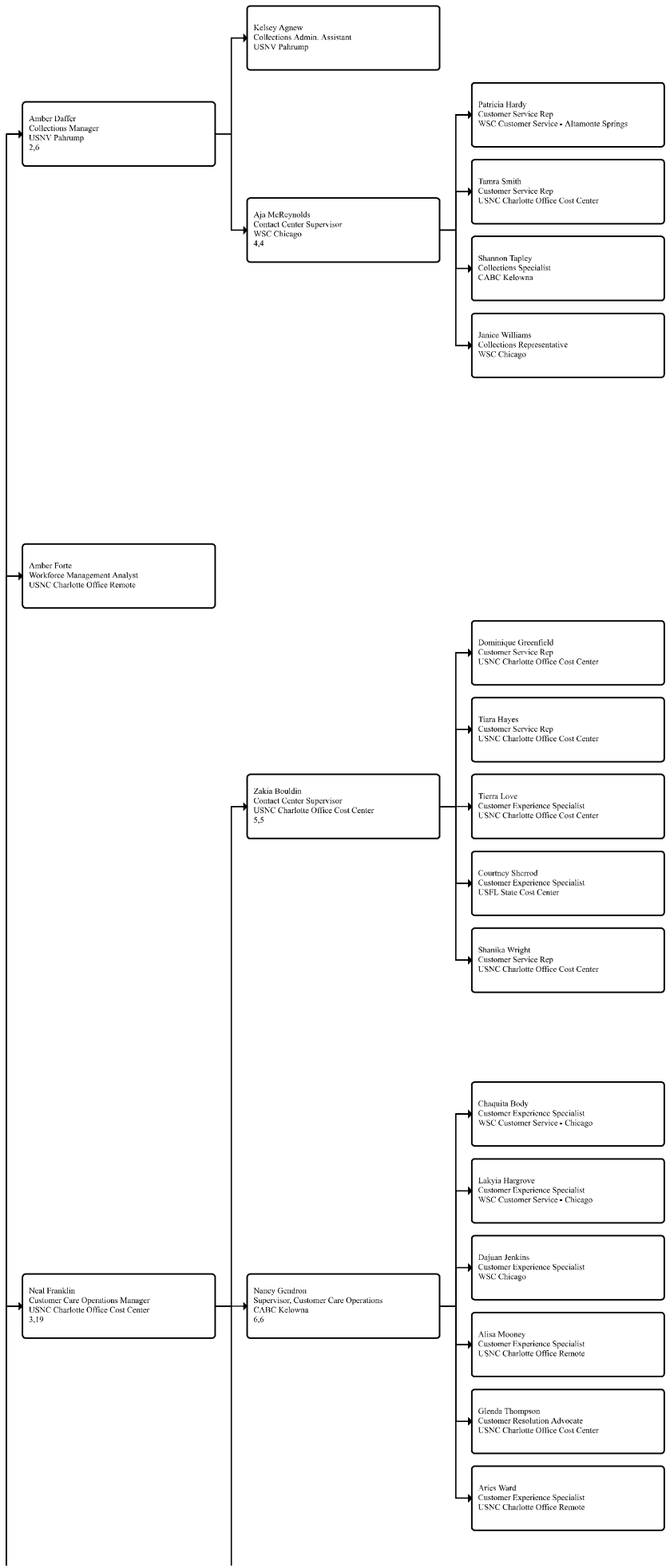
**Witness:**

James Kilbane









Matthew Chandler  
Contact Center Administrator  
USFL Weathersfield W  
5,48

Kaitlynn Gilbert  
Customer Service Rep  
WSC Chicago  
5,5

- Jennifer Akers  
Customer Service Rep  
USFL Weathersfield W
- Carl Crutchfield  
Customer Service Rep  
USFL Weathersfield W
- Roslyn Lido-Miller  
Customer Service Rep  
USNC Charlotte Office Cost Center
- Tina Richardson  
Customer Service Rep  
USNC Charlotte Office Cost Center
- Shanika Simmons  
Customer Experience Specialist  
USNC Charlotte Office Cost Center

Vincent Hicks  
Customer Service Administrative Assistan...  
USFL Weathersfield W

Steven Crowder  
Contact Center Supervisor  
WSC Chicago  
7,7

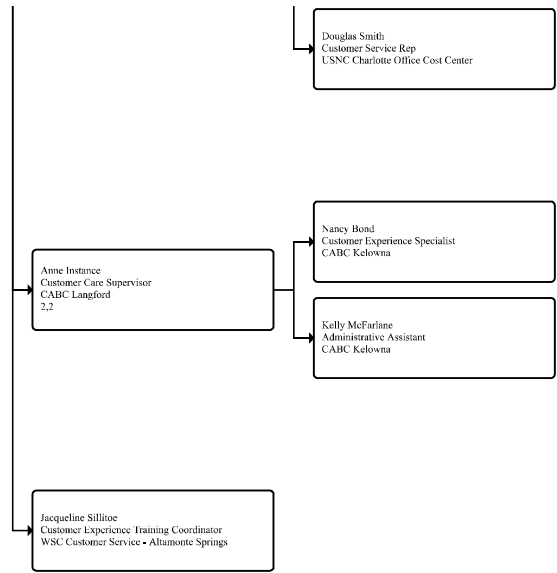
- Isabel Ceballos  
Customer Resolution Advocate  
USFL Weathersfield W
- Ebony Diggs  
Customer Experience Specialist  
WSC Customer Service • Chicago
- Sheila Edwards  
Collections Representative  
WSC Customer Service • Chicago
- Lorie Majeski  
Customer Resolution Advocate  
USFL Weathersfield W
- Sandra Soto Long  
Customer Resolution Advocate  
USNC Charlotte Office Cost Center
- Yvette Starr  
Customer Experience Specialist  
WSC Chicago
- Bianca Washington  
Customer Experience Specialist  
WSC Customer Service • Chicago

Ferrellyn Trovinger  
Customer Care Operations Manager  
USFL Weathersfield W  
4,18

Iwan Dehnert  
Contact Center Supervisor  
USFL Weathersfield W  
5,5

- Patricia Askia  
Customer Service Rep  
WSC Chicago
- Yoleydis Gonzalez  
Customer Service Rep  
USFL Weathersfield W
- Kelly Ilagan  
Customer Service Rep  
USFL Weathersfield W
- Jerry Lazare  
Customer Service Rep  
USFL Weathersfield W

OrgChart (6).svg



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**AG DR 2-3:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Items 3(j) – (m). The Company asserts that Items (j) – (m) are not applicable. Explain in detail why these items are not applicable to Water Service Kentucky.

**Response:**

j. The Company does not award bonuses to non-salaried employees

k. The Company does give awards based on certificate achievement to non-salaried employees.

Below is a table showing the average award per non-salaried employee.

	Average award per non-salary employee	
2017	\$	-
2018	\$	-
2019	\$	250
2020	\$	-
2021	\$	-
2022	\$	136

l. The Company does not give vehicle allowance to non-salaried employees.

m. The Company does not provide incentive compensation to non-salaried employees.

**Witness:**

James Kilbane



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**AG DR 2-4:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 7.

a. Explain in detail why the Director of Engineering and Asset Management position has been vacant since November 2021.

b. Water Service Kentucky asserts that the Director of Engineering and Asset Management position is expected to be filled by September 30, 2022. Provide an update as to whether an offer has been made to an applicant for this position since the prior response. Consider this a continuing request throughout the pendency of the case.

c. Identify what city/state the Director of Engineering and Asset Management position is located in and designate which Corix entity the position will be employed under.

d. The Company states that the Director of Engineering and Asset Management position is currently posted and available, and the salary of \$133,750 is included in the proposed revenue requirement.

i. Explain whether monetary amounts associated with the benefits for the Director of Engineering and Asset Management position are included in the proposed revenue requirement. If so, identify the total monetary amount for the benefits, along with a breakdown of the amount.

ii. Explain whether 100% of the salary and benefits for the Director of Engineering and Asset Management position are allocated to Water Service Kentucky, or a different percentage. If 100% of the salary and benefit costs for the Director of Engineering and Asset management position is allocated to Water Service Kentucky, explain why.

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e. Explain in detail how the Director of Engineering and Asset Management position is “necessary” if the position has been vacant since November 2021.

f. Explain why Water Service Kentucky’s customers should be required to pay for the costs associated with the Director of Engineering and Asset Management position even though it has been vacant since November 2021.

**Response:**

a. The employee voluntarily terminated his employment in November 2021. Due to the tightening of the job market, the Company was not able to find a satisfactory replacement within the last year. The job has been posted on several websites which include: Indeed, HireaHero, JOFDAV, USDiversity, and State Compliance. There has been approximately 10 applications received.

b. No offer has been extended as of the date of this response.

c. Since this position is currently open, it is not possible to identify the city and state. Once hired, the employee will be employed by Water Service Corporation and assigned responsibility for the North Region water/sewer operating entities.

d. i. The Excel file PSC DR 1-49 Exhibit 18-32-29 - Schedule B - S&W-PR Taxes-Benefits REDACTED UPDATED 8.10.2022 tab 2023 test year line 10 includes all benefits, payroll taxes and salaries that were used to calculate the total compensation for the position. Line 44, columns W, AE, and AP reflect the dollars that were included in the revenue requirement.

d. ii. See file referenced in response to D.i. above. 13.65% is the allocation to Kentucky for the position.

e. The Director of Engineering and Asset Management position is a crucial position for the continued work to properly maintain, replace and expand the assets of WSCK. While this position has been vacant, other Directors from other regions have supported the job responsibilities in a

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limited capacity for WSCK and other operating utilities in its region. However, this current arrangement is not sustainable and is only being done currently because of the critical nature of this role. WSCK is not otherwise equipped with the personnel to handle the requirements of this position with its remaining staff due to the expertise associated with the position's activities. Should the position not be filled permanently, additional costs may be incurred, such as by use of outside contractors or temporary employees.

f. Recovery of expenses related to this position is reasonable because the job duties of this position are temporarily being shifted to and performed by Directors from other regions. As discussed above, shifting these duties to other Directors is not sustainable and cannot be a long-term solution. Even if it were a possible solution, it would be appropriate to allocate salary expense of those Directors to WSCK on a going basis. The expenses for this position were included and approved in the 2020-00160 rate case.

**Witness:** James Kilbane / Seth Whitney

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**AG DR 2-5:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 7.

a. Explain in detail why the Kentucky Operations Apprentice position has been vacant since May 2021.

b. Provide the monetary amount for the salary that has been included in the proposed revenue requirement for the Kentucky Operations Apprentice position.

c. Provide the monetary amount for the benefits that has been included in the proposed revenue requirement for the Kentucky Operations Apprentice position.

d. Water Service Kentucky asserts that the Kentucky Operations Apprentice position is expected to be filled by September 30, 2022. Provide an update as to whether an offer has been made to an applicant for this position since the prior response. Consider this a continuing request throughout the pendency of the case.

e. Identify what city the Kentucky Operations Apprentice position is located in and designate which Corix entity the position will be employed under.

f. Explain in detail why the Kentucky Operations Apprentice position is necessary if the position has been vacant since May 2021.

g. Explain whether any of Water Service Kentucky's operators are planning on leaving or retiring in the near future.

h. Explain why Water Service Kentucky's customers should be required to pay for the costs associated with the Kentucky Operations Apprentice position even though it has been vacant since May 2021.

**Response:** a. The position was vacant for a time due to not having any applicants for the position.

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b. and c. The Excel file PSC DR 1-49 Exhibit 18-32-29 - Schedule B - S&W-PR Taxes-Benefits REDACTED UPDATED 8.10.2022 tab 2023 test year line 26 includes all benefits, payroll taxes and salaries that were used to calculate the total compensation for the position. Line 60, columns W, AE, and AP have the dollars that were included in the revenue requirement.

d. This position has been filled.

e. The position is in Middlesboro, Kentucky. The employee is employed by Water Service Corporation.

f. WSCK initiated an apprentice program in 2019. Working with interested students, we selected a candidate who then worked 20 hours per week up until the COVID-19 outbreak. In May 2020, a vacancy for a full-time position became available and was offered to the apprentice, who accepted the job. Since the apprentice already had job training, the transition to the field was seamless, saving WSCK time that would have otherwise been spent training someone who had not done an apprenticeship. These types of apprenticeships are vital the success of WSCK and the industry. As Kentucky Rural Water Association has recognized, these types of programs are “in response to the growing demand for skilled operators as more and more operators are reaching retirement age. . . . The apprenticeship program will create another pipeline to replace Kentucky’s aging workforce.”

g. No such notice has been provided to the Company by any employees at this time.

h. As stated in response (d) above, the position has been filled. In addition, response (f) above explains the benefit this position has to WSCK and its customers.

**Witness:** Seth Whitney / James Kilbane

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**AG DR 2-6:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 8.

a. Provide titles and descriptions for the two full-time employment positions in the city of Clinton.

b. Provide titles and descriptions for the eleven full-time employment positions in the city of Middlesboro.

**Response:**

Please see PSC DR 1-49 Watkins WSCK Exhibits Confidential.pdf for all job descriptions and locations in Middlesboro and Clinton.

**Witness:**

James Kilbane

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**AG DR 2-7:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 10(a). Explain why it is necessary to convert the number of customer connections to equivalent residential customers based upon the AWWA ratios of meter size flow rates to a standard 5/8" meter.

**Response:**

The company converts customer connections to ERCs so as to equalize levels of service needs among different areas, effectively creating a common denominator across the affiliate operating areas. They are used to properly allocate cost among different affiliates that have differing mixes of customers (e.g., large commercial/resort customers, bulk connections, fire customers, etc.).

**Witness:** James Kilbane

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**AG DR 2-8:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 10(b). The answer is nonresponsive. As originally requested, provide the number of actual customers that Water Service Kentucky provided service to for each year from 2017 – the present date. Provide the information in a chart similar to Water Service Kentucky's response to the Attorney General's First Request, Item 10(c).

**Response:**

WSCK respectfully disagrees with the characterization that the answer to AG DR 1-10(b) is nonresponsive. The number of actual customers that Water Service Kentucky provided service to for each year from 2017 – the present date is identified on page 6 of Application Exhibit 29 Schedule A. However, the Company notes that the Ambleside surcharge is included, which effectively double counts those customers. Below is the revised customer count by year end and most recent month for 2022:

2017	2018	2019	2020	2021	07/31/2022
6,491	6,494	6,474	6,425	6,411	6,326

**Witness:**

James Kilbane



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**AG DR 2-9:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Items 10(d), (e), and (f).

a. Explain whether the 983 customers outside of the Middlesboro city boundaries as of July 21, 2022, were included or excluded from the response stating that as of June 30, 2022, there were 5,526 active water service customers in Middlesboro.

b. Explain whether the 47 customers outside of the Clinton city boundaries as of July 21, 2022, were included or excluded from the response stating that as of June 30, 2022, there were 572 active water service customers in Clinton.

**Response:**

a. The 5,526 active customers would have been inclusive of the 983 customers outside of the Middlesboro city limits with the exception of the timing between June 30 and July 21.

b. The 572 active customers would have been inclusive of the 47 customers outside of the Clinton city limits with the exception of the timing between June 30 and July 21.

**Witness:**

James Kilbane

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**AG DR 2-10:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 13(e)(i). Provide the full name for the Corix entity that was able to negotiate a discount on nationwide pricing with Neptune AMI.

**Response:** Corix Infrastructure (US) Inc.

**Witness:** Seth Whitney

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**AG DR 2-11:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 14(a).

a. The answer is nonresponsive. Explain in detail why the Company is proposing a 32.1% increase to the monthly customer charge, instead of either keeping the customer charge the same or proposing a smaller, more manageable increase.

b. Explain whether Water Service Kentucky has ever conducted a cost-of-service study ("COSS"). If so, provide a copy and details of the same. If not, explain in detail why not.

**Response:**

a. WSCK respectfully disagrees with the characterization that the answer to AG DR 1-14(a) is nonresponsive. WSCK is proposing a 32.1% increase to the monthly customer charge because the Commission has previously held that an across-the-board increase is an "appropriate and equitable method of cost allocation" in the absence of a cost-of-service study.

b. WSCK most recently filed a cost-of-service study with its Application in Case No. 2018-00208, to which the Attorney General was an intervening party. WSCK provided certain revised calculations of its cost-of-service study in that case in response to Item 4 of the Commission Staff's Post-Hearing Data Requests, filed January 11, 2019.

**Witness:** Legal/James Kilbane

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**AG DR 2-12:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 14(b).

a. Compare and contrast the Ambleside subdivision's private fire hydrant surcharge current rate of \$3.86 per customer, and proposed rate of \$5.10 per customer, with the Company's charges for other private and public fire hydrants outside of the Ambleside subdivision. If there is a difference in rates charged to the Ambleside subdivision's fire hydrants, explain why in detail.

b. Explain the reasoning to require the Ambleside subdivision customers to pay a separate surcharge for the fire hydrants.

**Response:** The only difference in charges for hydrants is the surcharge for Ambleside subdivision's hydrants. The Commission explained the reasoning for its approval of the surcharge in Case No. 2018-00208, stating as follows:

Water Service Kentucky proposed a monthly surcharge rate for the customers residing in Ambleside Subdivision located in Middlesboro, Kentucky, for the operation and maintenance of the hydrants located within the subdivision. Water Service Kentucky claimed that the hydrants built in the subdivision have not been receiving payment from the subdivision's developer, Ambleside, LLC, since 2008. Through discovery, the Commission found that Water Service Kentucky failed to appropriately collect payments for the hydrants from Ambleside, LLC, did not address the hydrants in a prior rate case, and instead decided to accrue a bad debt expense for the hydrants that resulted in subsidization by all other customers. As noted in PSC Staff Opinion 2010-016, Commission regulations permit Water Service Kentucky to discontinue water service for any failure to pay outstanding fees for private hydrant services pursuant to 807 KAR 5:006, Section 14(f). Water Service Kentucky elected to continue service to the hydrants as stopping service was seen as a potential fire hazard and to continue billing Ambleside, LLC, for the cost of the hydrants.

The Commission agrees with Water Service Kentucky's proposal of a surcharge to customers of Ambleside subdivision that include the

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operation and maintenance costs associated with the Ambleside private fire hydrants. In determining the monthly surcharge, the monthly private hydrant rate was multiplied by the number of hydrants in the subdivision, and then divided by the total amount of customers within Ambleside resulting in a \$3.33 monthly charge. The Commission notes that "per hydrant" should be removed from the Ambleside Private Fire Surcharge rate listed in Water Service Kentucky's proposed tariff sheet and replaced with "per customer," as this is a monthly rate per customer located within the subdivision. Water Service Kentucky should provide notice of the Ambleside Private Fire Surcharge to the residents of Ambleside subdivision in accordance with the notice requirements of 807 KAR 5:011, Section 8, and KRS 278.180. Water Service Kentucky should include the explanation for the surcharge in the notice that it is required to continue operation and maintenance of the hydrants.

**Witness:** James Kilbane

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**AG DR 2-13:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 15(b). Water Service Kentucky states that when the 2021 annual report was filed, one position was vacant.

- a. Explain which position was vacant.
- b. Explain whether the prior vacant position has been filled, and if so, provide the date that the position was filled.
- c. Explain whether Water Service Kentucky is asserting that there are 13 full-time employees working in Kentucky now. If not, explain why not.

**Response:**

- a. The apprentice position was vacant.
- b. The position has been filled as of September 17, 2022. Please see attached file.
- c. Yes, there are 13 full-time employees working in Kentucky as of September 20, 2022.

**Witness:**

James Kilbane

# Job Offer Accepted

Wednesday, August 31, 2022



Dear 

After careful consideration, Water Service Corporation, a Company in the Corix Group of Companies (the "Company") is pleased to extend to you an offer of employment. The details of your offer are as follows:

Your position with the Company will be as a/an Operations Apprentice. You will perform this role within our Water Service Corporation of Kentucky Business Unit. You will be expected to perform the job duties as described in the job description. Your immediate supervisor will be Colby Wilson, State Operations Manager. Should you choose to accept this position your tentative start date will be on Saturday, September 17, 2022.

Your initial compensation will be \$15.00 per hour, with the proper deductions made for all required withholdings. As a non-exempt employee, you will be compensated for overtime in accordance with Company overtime policy, federal and state laws.

Your performance goals will be set and evaluated through an Employee Excellence Plan that will be established between you and your direct Manager. Continued employment is contingent upon your meeting our job expectations on an on-going basis.

Your employment with the Company is at will, meaning either you or the Company may terminate the employment relationship at any time, with or without notice, and with or without cause, for any reason.

Upon your completion of 30 days of continuous employment you will be eligible for 72 hours of paid time off, pro-rated for the remainder of the year.

If eligibility requirements are met, you will be automatically enrolled in the group 401(K) plan with a default deferral of 3%. These contributions will begin on the 1<sup>st</sup> of the month following 30 days of continuous employment. You may opt out or change your deferral at any time.

The offer described above is contingent upon the results of your background check. In addition, you will be required to complete a successful drug screening test. The drug test must be completed within 2 business days of accepting this offer.

As a Company employee, you will be expected to abide by Company rules and policies. You may not disclose confidential Company information to unauthorized third parties.

This letter forms the complete and exclusive statement of employment between you and the Company. These employment terms supersede any other agreements, understandings, promises or communications, written or oral, by or on behalf of the Company.

On your start date, you will receive your new hire paperwork which will include an I-9 form as required by law. This form requires you to provide proof of identification and authorization to work in the United States. Section 1 of your I-9 must be completed on your first day of employment. Failure to do so will result in your ineligibility to continue work with the Company until such documentation is provided.

To indicate your acceptance of this offer of employment, please electronically sign within 2 business days of its receipt

Your electronic signature consists of typing your name on the following screen after clicking "Accept", this serves as your formal acceptance.

If you have any questions, please email [PeopleTeam@corix.com](mailto:PeopleTeam@corix.com) We look forward to working with you and are confident that you will make a significant contribution to the Company. Welcome!

Sincerely,

*Elony Benson*

Human Resources

I acknowledge and accept this position in accordance with the terms stated herein.

[Redacted]

*E-Signature*

Aug 31, 2022

*Date*

IP Address [Redacted]

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**More Info**

**Operations Apprentice (Student Work Study) 012019.pdf**

**Candidate Information Form.pdf**



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**AG DR 2-14:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 16.

- a. Provide further explanation as to what invoices the City of Clinton processes for a \$2.00 fee and explain why Water Service Kentucky does not process the invoices in-house.
- b. Explain in full detail what is meant by the response that "[t]he CSC annual invoice is for statutory representation." Include in the explanation the full name of the abbreviation CSC.
- c. Confirm that all other expenses located in the Application, Exhibit 31 are not included in the proposed rates except for the invoices from the City of Clinton and CSC.

**Response:**

- a. The City of Clinton charged \$2.00 per payment processing. The Company did not take in-house payments in Clinton due to low staffing levels. As of February 1, 2022, the City of Clinton is no longer providing that service, and the Company installed a dropbox to accept hand-delivered payments. The Company acknowledges that the City of Clinton charge of \$5,232 should not be included in the revenue requirement for this rate case.
- b. CSC is also known as "Corporation Service Company." It provides registered agent and business compliance services.
- c. The Company does not confirm that all of cost listed in Exhibit 31 are excluded from the application with the exceptions of CSC and the City of Clinton. The forecast amounts that are included in the application are stated on Exhibit 31 under the header "Total Forecast Period".

**Witness:** James Kilbane

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**AG DR 2-15:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Items 17(a) – (j). These answers are nonresponsive.

a. As originally requested, provide an explanation for the increase in base wages in the base period from \$756,228 to \$821,306 in the forecast period.

b. As originally requested, provide an explanation for the increase in overtime wages in the base period from \$40,857 to \$44,675 in the forecast period.

c. As originally requested, provide an explanation for the increase in holiday wages in the base period from \$52,385 to \$58,714 in the forecast period.

d. As originally requested, provide an explanation for the increase in deferred compensation in the base period from \$10,756 to \$11,163 in the forecast period.

e. As originally requested, provide an explanation for the increase in 401K Non-Elective Contribution in the base period from \$22,171 to \$27,957 in the forecast period.

f. As originally requested, provide an explanation for the increase in 401K Match in the base period from \$20,554 to \$37,276 in the forecast period.

g. As originally requested, provide an explanation for the increase in Health Insurance, Net in the base period from \$155,805 to \$188,595 in the forecast period.

h. As originally requested, provide an explanation for the increase in Other Employee Benefits (Vision) in the base period from \$1,282 to \$1,879 in the forecast period.

i. As originally requested, provide an explanation for the increase in FICA in the base period from \$64,037 to \$69,712 in the forecast period.

j. As originally requested, provide an explanation for the \$3,617 amount located in the Base Wages row, and under the Senior VP Base period and Forecast period column.

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k. Explain who the Senior VP is as referenced in subpart (j), and which entity this person works for in the Corix group of companies.

l. Provide the total base wages for the Senior VP in the base period and the forecast period.

m. Provide an explanation for the \$53,763 amount located in the Base Wages row, and under the President Forecast Period column.

n. Provide the total base wages for the President for the base period and the forecast period.

**Response:**

For Items a through i, please refer to Excel file PSC\_DR\_1-49 Exhibits 18-32-29 Schedule B - S&W Payroll Taxes-Benefits REDACTED.xlsx for all wage calculations and increases. Merit increases, midpoint market increases, third party increases in healthcare cost, and full manning are represented as the reason for the increases.

a. Merit increases, midpoint market increases, and full manning are represented as the reason for the increases.

b. Merit increases, midpoint market increases, and full manning are represented as the reason for the increases.

c. Merit increases, midpoint market increases, and full manning are represented as the reason for the increases.

d. Merit increases, midpoint market increases, and full manning are represented as the reason for the increases.

e. Merit increases, midpoint market increases, and full manning are represented as the reason for the increases.

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f. Merit increases, midpoint market increases, and full manning are represented as the reason for the increases.

g. Third party increases and full manning are represented as the reason for the increases.

h. Full manning is represented as the reason for the increases

i. Merit increases, midpoint market increases, and full manning are represented as the reason for the increases.

j. The new Excel file AG DR 2-15 PSC DR 1-49 Exhibit 18-32-29 - Schedule B - S&W-PR Taxes-Benefits REDACTED UPDATED 9.26.2022 has a correction to the original file which had a formula error. The formula should have linked to the 2023 tab and the cell in reference refers to the Senior Vice President's wages being allocated to Kentucky. The number has changed due to position changes since the initial revenue requirement submission.

k. This currently refers to Seth Whitney; please see responses to AG DR 2-1 and AG DR 2-2.

l. Please see AG DR 2-15 PSC DR 1-49 Exhibit 18-32-29 - Schedule B - S&W-PR Taxes-Benefits REDACTED UPDATED 9.26.2022 tabs base period and 2023 test year, line 7.

m and n. The personnel changes have made this dollar amount for President allocated to Kentucky as 0 since there is no distinct President position in Kentucky – the Senior Vice President for the North Region is also President for WSCK.

**Witness:**

James Kilbane

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**AG DR 2-16:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 18(b). Provide the response with the full names of the Corix companies instead of abbreviations.

**Response:** "CII" refers to Corix Infrastructure Inc. "CRU" refers to Corix Regulated Utilities Inc, previously known as Utilities Inc. "CIUS" refers to Corix Infrastructure (US) Inc.

**Witness:** Seth Whitney

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**AG DR 2-17:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 18(c). The answer is nonresponsive. As originally requested, provide the estimated percentage of time that Mr. Whitney is physically at his Middlesboro, Kentucky office versus his office in Cleveland, Ohio.

**Response:** The majority of Mr. Whitney's work is able to be done remote via phone calls, emails, video conferencing, and general work that is able to be done from any office. Mr. Whitney physically visits the Kentucky systems as needed and estimates such time at 5-10 percent. However, this is not representative of the amount of time Mr. Whitney works on matters related to WSCK in any given year.

**Witness:** Seth Whitney

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**AG DR 2-18:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 20(b).

a. The Company states that Water Service Kentucky manages all of its costs on a monthly basis through reviews with FP&A, Water Service Kentucky, and management. Identify what FP&A stands for in the response.

b. Provide all opportunities for cost reduction that are discussed, and whether any have been implemented.

**Response:**

A. FP&A stands for Financial Planning & Analysis.

B. Periodic financial reviews are conducted and used to identify opportunities for cost savings and to ensure that costs do not unknowingly increase. When savings opportunities are identified, they are pursued. Examples of these opportunities include the following:

- Chemical Costs –usage, pricing, optimal selection and volumes
- Vehicle Fuel – reviewing usage and ensuring that it is not unnecessarily being used (i.e. - unneeded truck idling)
- Outside Services – reviewing quotes/cost for reasonableness. Opportunities to source differently (i.e. - leverage volume discounts for “like” services as part of the larger Corix entity)
- Utility Costs – review against historical and investigate when increasing (i.e. - equipment run hour increases)
- Labor and related – review headcount, vacancies, optimal staffing levels and skillsets, and employee development opportunities

**Witness:** Seth Whitney

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**AG DR 2-19:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 21(e)(ii). Explain why Water Service Kentucky has never refused to pay for an allocation from WSC or the Corix group of companies.

**Response:** Costs allocated to WSCK have followed proper allocation procedures and have been found to be reasonable. Therefore, WSCK has not had the need to refuse cost allocations.

**Witness:** Seth Whitney



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**AG DR 2-20:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 22(a)(iii). Expound upon the specific types of recognition and awards that are given to the employees under the new program for anniversaries, birthdays, service awards, etc. Include in the discussion whether monetary awards or the like are provided.

**Response:** The program serves as a repository of significant dates which provides a reference that individuals can consult. Through the same platform, individuals can send an e-card to acknowledge the accomplishment and provide recognition. For work anniversary dates, employees receive points that can be redeemed for various products or gift cards. The points received are consistent with the monetary value that had previously been in place.

**Witness:** Seth Whitney

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**AG DR 2-21:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 23(b). Expound upon how Water Service Kentucky plans to improve stakeholder awareness and collaboration with its customers and communities.

**Response:** WSCK achieves stakeholder awareness and collaboration through a focus on continuing to openly communicate and engage with its team members, customers, and communities on a regular basis in order to build and maintain positive relationships. Some examples of how this is done are updates to the website, utilizing the MyUtility Connect App, stakeholder/customer meetings, customer mailings, and bill inserts. It is also accomplished by providing relevant and timely billing, service, and operational information.

**Witness:** Seth Whitney

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**AG DR 2-22:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 23(f). Provide a detailed explanation of the Drivers Score Summary Report Attachment, including but not limited to, how these statistics are obtained, what each score indicates, and the optimal score for each column heading.

**Response:** The statistics provided in AG DR 1-23(f) are obtained through a fleet safety management system that collects real-time telemetric data from a GPS tracking device installed on Company vehicles. Braking, speed, and acceleration events are recorded and tabulated by employee. Column headings HB#, HCB#, Speed#, PSL#, and SA# are the total number of events recorded. These events are then used to calculate a score for each respective category, as well as an overall driver safety score. See the attachment below for a description of how the scores are calculated. The scores shown in the referenced table are an average of all employees during the quarter shown. The overall driver safety score target is 90 or better.

**Witness:** Seth Whitney



# ADVANCED DRIVER SCORES



Azuga’s driver score reflects the level of risk associated with a person’s driving behaviors. The scoring algorithm factors in duration, magnitude and frequency of speeding, braking, acceleration and idling events along with the time of day and weather conditions of these events. The first three safety factors are known predictors of crash events and are used by the insurance industry to evaluate risk. Idling is a known cause of excessive fuel use and engine wear.

Scores are generated daily for the previous day’s driving with a score of 100 representing the best driver of the fleet. Scores are generated for Braking, Speeding, Acceleration and Idling, and are weighted to form a composite average ‘Driver Score’ for that day. This Driver Score allows drivers to be compared to each other and for the same driver to be compared across time, while also providing an indication of the risk associated with the driver during that day.

## BRAKING AND ACCELERATION SCORES

Each braking event is scored by analyzing the magnitude of the event (how fast the vehicle is accelerated or stopped). The sum of all braking event scores and acceleration event scores for each driver in a day is normalized by the number of miles driven during that day, and is then converted to a score between 0 and 100. The final score is adjusted to account for differences in the number of miles driven by drivers in a fleet and calibrated such that an average driver with two braking events gets a score of 70 (ensuring that drivers with more miles driven receive better score than those with fewer miles and the same number of events).

## SPEEDING SCORES

Each speeding event is scored by comparing the average speed of the event with the maximum posted speed limit of the state where the event occurred, along with the duration of the event, time of day and weather. A daily speeding score for a driver is computed normalizing for the total miles driven that day. An average driver with a speeding duration of 6 minutes for a fixed distance gets a score of 70.

## IDLING SCORES

Idling scores are based on the proportion of trip idling time to the total trip time over the entire day. In order to factor in unavoidable idle times such as at stop lights, the idling score is not penalized where the overall idling proportion is less than ten percent. The proportion of idling time to total trip time above ten percent is converted to an Idling Score and adjusted for the relative miles driven. The Idling Score has been calibrated for an average driver with 21% idling to get a score of 70.



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**AG DR 2-23:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 24(b). Explain in detail how the Advanced Metering Infrastructure ("AMI") meters will alert Water Service Kentucky of a water leak. In the response, differentiate between leaks attributable to a metered customer, and leaks for which no metered customer is responsible.

**Response:** AMI metering will alert WSCK to customer water usage at any time of day within a billing period, as well as alerting WSCK to excessive water usage at a residence, potentially avoiding high bills or even property damage. AMI will not be able to alert WSCK to nonmetered leaks. AMI installation expands opportunities and benefits to install master meters around WSCK service areas to monitor areas of the distribution system.

**Witness:** Colby Wilson

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**AG DR 2-24:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 24(c). As originally requested, expound upon the examples of the "more important tasks" that the meter reader staff will be deployed to if AMI is approved.

**Response:** If deployed, WSCK meter reading staff would have more time to spend on improving customer relationships per service order visit, as opposed to handling numerous service orders related to missed reads, high reads, re-reads, etc. The increased time spent with customers can also help avoid customer service calls to the call center. This time can also be spent on infrastructure maintenance and improvements throughout the systems without relying on outside contractors. WSCK employees will continue to test 10% of the meters every year, as well as exercising and inspecting all valves annually.

**Witness:** Colby Wilson

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**AG DR 2-25:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 25(a). The Company asserts that the updated logo allows Water Service Kentucky's customers to see that their fellow citizens are "managing" the local water system. However, in response to the Attorney General's First Request, Item 15(c), the Company confirmed that 100% of Water Service Kentucky's management lives outside of Kentucky. Reconcile these two responses.

**Response:** WSCK objects to this question, as it mischaracterizes WSCK's response to AG DR 1-15(c). Subject to and without waiving the foregoing objection, WSCK states as follows: WSCK has thirteen full-time employees stationed in Kentucky that manage the water utility operations. This is consistent with the statements that "WSCK is a local company with local staff serving its customers" and WSCK customers' "fellow citizens" are managing the system.

**Witness:** Legal/Seth Whitney

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**AG DR 2-26:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 26. Explain in detail how the Company interprets the Net Promoter Score ("NPS") survey results as a positive response when the customers' concerns were high cost, poor customer service, and a faulty website.

**Response:** The overall results of the survey were positive in that WSCK was more than double the score of the industry average with a score of 17.9 versus an industry average of 8. In addition, a majority of respondents were identified to be a "promoter" of the Company. This means that, overall, a majority of respondents have a positive view of the Company and would recommend the service provided by WSCK. The concerns identified in this discovery request come from comments of 2-3 out of 95 respondents.

**Witness:** Seth Whitney



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**AG DR 2-27:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 27(b). Confirm that the low-income rate that Water Service Kentucky proposed in Case No. 2022-00147, was denied by the Commission in the final Order as a matter of law. Specifically, according to the final Order the proposal was in violation of KRS 278.030, as well as KRS 278.170(1). If not confirmed, explain why not in detail.

**Response:** The Company interprets the above reference to Case No. 2022-00147 as "Case No. 2020-00160". The Commission's Order speaks for itself. It stated:

The Commission finds that the discounted rate should be denied as a matter of law. KRS 278.030(3) allows a utility to employ suitable and reasonable classifications of rates that may take into account "the nature of the use, the quality used, the time when used, the purpose for which used, and any other reasonable consideration." KRS 278.030 statute does not explicitly permit the establishment of a customer classification based upon income level, and, thus, the Commission is not authorized to create a separate rate class for low-income residential customers apart from the general residential customer class. Furthermore, KRS 278.170(1) prohibits the establishment of rates that "maintain any unreasonable difference between localities or between classes of service for doing a like and contemporaneous service under the same or substantially the same conditions." As the Commission is a creature of statute, we are without the power to approve Water Service Kentucky's proposed reduced rate.

**Witness:** Legal

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**AG DR 2-28:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 28(b). As originally requested, provide the percentage of time that Mr. Kilbane is physically at the Middlesboro, Kentucky office versus his office in Cleveland, Ohio.

**Response:**

Mr. Kilbane has not spent any time physically in the Middlesboro office. However, as previously stated, and notwithstanding the ability of Mr. Kilbane to perform his activities remotely, Mr. Kilbane's job responsibilities for his designated operating areas will vary in focus from time to time depending on the activities each entity is engaged in during any given period. As such, the Company uses the established cost allocation methods utilized within Corix to allocate expenses associated with Mr. Kilbane's position.

**Witness:**

James Kilbane

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**AG DR 2-29:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 33.

a. Explain in detail whether Water Service Kentucky is asserting that due to inadvertently including J.D. Edwards financial software system costs in the pending application, the revenue requirement should be reduced \$1,927 for the base period, and \$1,872 for the forecast period. If not, explain the response in full detail.

b. Explain in detail whether Water Service Kentucky is asserting that due to inadvertently including Oracle customer care and billing system costs in the pending application, the revenue requirement should be reduced \$2,723 for the base period, and \$2,671 for the forecast period. If not, explain the response in full detail.

**Response:** In response to AG DR 1-32, the Company noted the revenue requirement impact of inadvertently including the previously disallowed investments in Project Phoenix (which covered JD Edwards and CC&B implementation). In response to AG DR 1-33, the Company identified the revenue requirement associated with later enhancements to JD Edwards and CC&B, that were not part of Project Phoenix. These enhancements have been requested and recovered in prior rate cases.

**Witness:** James Kilbane

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**AG DR 2-30:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 34. In the Direct Testimony of James Kilbane ("Kilbane Testimony"), page 25, Mr. Kilbane stated that the Company was requesting for certain implementation and support costs that have not been capitalized for the Fusion project to be given regulatory asset treatment. However, in response to the Attorney General's First Request, Item 34, and the Commission Staff's Second Request for Information ("Staff's Second Request"), Item 11, Water Service Kentucky states that the Company is asking to establish and amortize the asset in the current case not establish a regulatory asset.

a. Explain in detail whether the Company is or is not requesting for certain implementation and support costs that have not been capitalized for the Fusion project to be given regulatory asset treatment. If not, explain what treatment is being requested for these costs.

b. Based upon this discrepancy, explain whether the Kilbane Testimony needs to be corrected. If not, explain why not.

**Response:** The Company is requesting the Commission authorize a regulatory asset for certain Fusion implementation costs, and authorize amortization of said regulatory asset. Mr. Kilbane's testimony statement that these costs "have not been capitalized" refers to their segregation from the Non-Current Asset established in GL account 194006.

**Witness:** James Kilbane

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**AG DR 2-31:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 42(a). Expound upon the type of leak-detection tools/equipment that Water Service Kentucky's employees use daily.

**Response:** WSCK employees use the Heath Aqua-Scope leak detection kit, which is an acoustic leak detection method.

**Witness:** Colby Wilson

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**AG DR 2-32:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 42(c). Even though Water Service Kentucky's total water loss percentage appears on the low end for the majority of the years between 2017 and the present date, explain in detail the various fluctuations of the water loss percentages from year to year. Include any specific information that the Company is aware of that caused the water loss percentage to increase and decrease throughout the years of 2017 to the present date.

**Response:** Total WSCK annual unaccounted for water loss has tended to be stable since 2018. Due to an aging infrastructure, water leaks have occurred sporadically throughout WSCK's distribution systems, with some months and years being worse than others. A significant leak in Middlesboro was identified in 2020 and promptly repaired. Leaks are most commonly identified in the spring and fall seasons.

**Witness:** Colby Wilson

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**AG DR 2-33:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 44(c). The Company asserts that the 2011 Toyota Prius is not a practical vehicle to suit the operational needs of the water system.

a. Based upon this assertion, explain why a Toyota Prius was purchased by the Company if it is not suited to support the operational needs of the water system.

b. Discuss the various purposes in which the Water Service Kentucky employees used the Toyota Prius.

**Response:** WSCK objects to this question because it is not relevant to this matter. Without waiving this objection, WSCK states as follows: When the Prius was first purchased it was intended for a manager's travel vehicle only, as it was capable of traversing the distance between Middlesboro and Clinton efficiently. To that end, it served the operational needs of the utility.

**Witness:** Legal / Colby Wilson

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**AG DR 2-34:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 45.

a. Explain in detail how the current Automated Meter Reading ("AMR") meters are at the end of their useful life, if the book depreciation life of the meters is 44.444 years. If there is a difference between the useful life and the depreciation life of the AMR meters explain the difference in full detail.

b. Provide the useful life of Water Service Kentucky's current AMR meters.

c. Explain in detail whether the Badger batteries could be changed out with new batteries on the current AMR meters, instead of having to completely replace the AMR meters with AMI meters.

**Response:** A. The Clinton AMR meter batteries have exceeded their useful life and are not readily replaceable, rendering the entire meter to be at the end of its useful life. Moreover, the book-depreciation life of an asset is not always representative of the useful life of that asset. For example, in the Company's 2018 rate case, it requested a depreciation rate of 5.8%, with a net salvage rate of 13%, and a useful life of 15 years. This proposed rate was rejected by the Commission, reverting to the NARUC 1979 study as authoritative for WSCK's depreciation rates. AMR meters and their batteries were not contemplated by the 1979 study.

B. The current useful battery life of WSCK's AMR meters is deemed to be 10 years, based on its experienced battery life.

C. No, this is not an option; the Badger Meter company determined that the batteries are obsolete and no longer provide a replacement for the antiquated technology.



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**Witness:** Colby Wilson / James Kilbane

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**AG DR 2-35:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 49. Explain what is covered under Neptune's 20-year AMI warranty with the first 10 years being fully comprehensive and the last 10 years being prorated.

**Response:** The first 10 years of the Neptune warranty cover all replacement parts and costs associated, at a full 100% replacement value. During the second 10-year period, the warranty covers replacement parts gradually decreasing in cost each year until it returns to full 100% replacement cost at the end of 20 years.

**Witness:** Colby Wilson

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**AG DR 2-36:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 52. The Company states that due to terrain issues in the service area, cellular data is not a reliable or secure method for transmitting AMI data and is not a viable option for the Company.

- a. Provide a detailed explanation of the terrain issues in the service area.
- b. If using cellular data is not a reliable or secure method to transmit AMI data, explain in detail how the Company proposes to transmit the AMI data.

**Response:** A. Portions of WSCK's service area in eastern Kentucky do not have access to reliable cell phone service. This is due to the mountainous terrain associated with Bell County.

B. Consistent with a propagation study done by Neptune Meter, WSCK proposes to install data collectors in selected locations around the service area. These data collectors will collect the readings and send them back to a central location without relying on traditional cellular service.

**Witness:** Colby Wilson

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**AG DR 2-37:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 53. Expound upon why a joint AMI project between neighboring water and wastewater systems was not feasible.

**Response:** While WSCK works closely with its neighboring water and wastewater utilities, both Middlesboro and Clinton are relatively isolated with regard to neighboring utilities. WSCK has had many open conversations with neighboring utilities about the reliability of industry products and user experience, but a joint project between those systems was not feasible even though WSCK will continue to share read results with these systems. WSCK plans to leverage its consolidated purchasing power through Corix-wide resources – which exceed the resources and scale of any nearby system, while utilizing consistent software systems - to implement AMI through an experienced provider.

**Witness:** Colby Wilson

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**AG DR 2-38:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 62. Water Service Kentucky states that the only AMR equipment the Company uses is in the Clinton water system.

a. Provide the specific type(s) of meters that the Company currently has in the city of Clinton, and in Hickman County.

b. Provide the specific type(s) of meters that the Company currently has in the city of Middlesboro, and in Bell County.

c. Explain whether the request to deploy AMI is for both the Clinton and Middlesboro water systems.

**Response:** A. In Clinton WSCK has a Badger AMR read system.

B. In Middlesboro, WSCK has a majority Badger manual read system. Starting in January 2022, WSCK employees have been removing Precision meters and replacing them with Neptune manual read (retrofittable) meters.

C. Yes, the proposed AMI systems will include both Middlesboro and Clinton.

**Witness:** Colby Wilson

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**AG DR 2-39:**

Refer to the Excel file AG\_DR\_1-82\_ and\_ 84\_ IS\_ and\_ DS attached to the response to the Attorney General’s First Request, Items 82 and 84, and further to the worksheet tab Insurance which includes the insurance expenses per year excerpted below. Explain in detail all known reasons why the forecasted period insurance costs allocated to the Company are expected to increase by \$42,453 (59.8%) from 2021 to the forecast period, especially since total insurance expenses are depicted as being fairly consistent in all other years.

Account	Description	2017	2018	2019	2020	2021	Base Period *	Forecasted Period
560100	General Liability Insurance	61,001	62,041	64,812	51,282	18,563	22,852	25,049
560200	Property Insurance	-	-	-	-	22,593	34,921	38,244
560300	Vehicle Insurance	-	-	-	16,559	18,040	19,445	21,295
560400	Uninsured Losses	-	-	-	-	1,837	14,152	14,852
560500	Other Insurance	14,287	15,885	7,617	5,636	9,915	12,895	13,962
	<b>Total Insurance Expense - Water</b>	<b>75,288</b>	<b>77,927</b>	<b>72,429</b>	<b>73,477</b>	<b>70,948</b>	<b>104,265</b>	<b>113,401</b>

**Response:**

Please generally refer to the response to PSC 1-50, file PSC DR 1-50 – Business Insurance. Key drivers affecting the 2021 insurance renewal program:

Corix performs an annual review of (required) inflationary uplift to the values for insurance purposes. This resulted in the increase on the Statement of Values companywide which has escalated the property base for insurance purposes.

Corix replaced, consolidated, and improved the existing multiple D&O liability policies across different Corix entities with broader coverages on favorable terms.

Consolidation of cybersecurity policy was implemented by Corix and excessive ransomware events in the market and the utilities industry is being considered high risk, resulting in increasing premiums.

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Please note that most policies renew in the fall of each calendar year, resulting in increases being fully realized in the following year after renewal.

Key drivers affecting the 2022 insurance renewal program

Corix performed another review of (required) inflationary uplift to the values for insurance purposes resulting in additional increase on the Statement of Values which has escalated the property base for insurance purposes.

Market conditions for all other lines are still affecting rates resulting in higher premiums.

**Witness:** Jennifer Toledo / James Kilbane

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**AG DR 2-40:**

Refer to the Application, Exhibit 28.8 and the Total Net Deferred Rate Case Expense – Water, as reflected in line 4. Refer also to the Excel file AG\_DR\_1-072\_-\_Exhibits\_10-20-28\_-\_Schedule\_A\_-\_Rate\_Base\_Components\_Updated\_7.28.22 attached to the response to the Attorney General’s First Request, Item 72. Refer also to the Kilbane Testimony at 25, wherein he describes the addition of the \$22,803 in Fusion implementation costs included in account 170009, the Rate Case Being Amortized account.

a. Provide a breakdown of the 13-month balance of \$423,478 included in rate base between the amount associated with the instant case, the amount associated with Case No. 2020-00160, and the amount associated with the Fusion implementation costs.

b. For each of the amounts above in response to subpart (a), indicate whether the Company has reflected the corresponding Accumulated Deferred Income Tax (“ADIT”) as a reduction to rate base. If not, explain why not for each. If so, indicate for each the amount reflected for ADIT in the forecast test year and the worksheet tab and cell references in the referenced Excel file or any other workpaper source that contains documentation for the ADIT reflection.

**Response:**

a. This detail can be ascertained by filtering the “Pro-Forma Def Chg” tab in the aforementioned file, column L, for account 170009. Below is a summary as requested.

Deferral	13 mo avg
Fusion Regulatory Asset	19,003
WSCK RC 2020	21,711
2022 Rate Case	382,764
Total	423,478



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- b. The Company did not include these balances in the pro-forma ADIT calculation in its request. The Company only included pro-forma changes in temporary differences based on book/tax depreciation for ADIT. The Company did not include pro-forma adjustments to ADIT for deferrals as 1) there are generally multiple items that offset in impact, such as rate case deferrals offsetting deferred maintenance, 2) the net effect tends to be immaterial, or 3) the pro-forma for the ADIT component is not readily estimable.

**Witness:** James Kilbane

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**AG DR 2-41:**

Refer to the Excel file AG DR 1-70 ADIT Rollforward attached to the response to the Attorney General's First Request, Item 70, which shows a rollforward of ADIT amounts by temporary difference through the end of June 2022. Refer further to the Federal ADIT liability balance for "Rate Case" of \$25,895.91 and State ADIT liability balance for "Rate Case" of \$10,012.85 that were reflected for all month ends starting with December 2021. Provide each of the temporary balances for each individual rate case that were associated with these balances and show how these ADIT amounts were determined. If any portions of these balances were not related to deferred rate case expenses, explain in detail.

**Response:** The ADIT balances in the rollforward file as of 12/31/2021 referenced reflect the ADIT for the unamortized portion of the 2020 rate case expense deferral and the Fusion Regulatory Asset requested in the current case. These unamortized balances were \$98,359 and \$23,044, respectively.

**Witness:** Don Hong

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**AG DR 2-42:**

Refer to Water Service Kentucky's response to the Staff's Second Request, Item 7, and the responses to the Attorney General's First Request, Items 81 (including attachment) and 94 in regard to Clinton Wastewater costs incurred in 2021 that will no longer be incurred due to the termination of the Clinton Wastewater contract termination.

- a. The response to the Attorney General's First Request, Item 94 indicates three separate maintenance and repair expenses that should be removed from the revenue requirement, \$7,950 in account 512022, \$3,296 in account 512900, and \$295.00 in account 513900. Provide a list of these and all other amounts, separated by account, that should be removed from the projected test year expenses related to the Clinton Wastewater contract expenses that will no longer be incurred.
- b. Refer to the list of expenses associated with the Clinton Wastewater contract expenses each year 2018 through 2021 provided in the attachment response to the Attorney General's First Request, Item 81. For each of the expense amounts listed for 2021, indicate whether the amount associated with that expense was removed (or otherwise not included) from the projected test year expenses in the filing. If removed, reference the account number and description in which the expense reduction was reflected. If not removed, identify the account number, account description, and amount associated with that expense and provide an explanation as to why the associated amount was not removed from the projected expenses.
- c. The list of 2021 expenses provided in response to the Staff's Second Request, Item 7 sums to \$48,629, while the list of 2021 expenses provided in response to the Attorney General's First Request, Item 81 sums to \$88,555. Provide a reconciliation of the two sets of expenses including

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explanations for each individual expense related to each difference. Include in the explanations whether the 2021 incurred expense is expected to reoccur after the end of 2021 and why.

d. Refer to the list of expenses associated with the Clinton Wastewater contract expenses each year 2018 through 2021 provided in the attachment response to the Attorney General's First Request, Item 81 and further to the amount for 2021 of \$31,133 for salaries and benefits. Describe this amount in regard to which employee(s) performed such services and the approximate hours involved that are no longer required. In addition, describe the functions now performed by this employee(s) now that the work related to the Clinton Wastewater contract is no longer needed.

**Response:**

Should be removed from 2023 test year	
Account	Dollars
512022	7950
512900	3296
a. 513900	295

b. Please see Excel AG DR 2-42 tab b.

c. Please see Excel AG DR 2-42 tab c. The labor and benefits, office expense, and transportation cost listed on the spreadsheet are expected to continue after 2021 because they are fixed costs which are not subject to change due to the cancellation of the Clinton Wastewater contract.

d. The 2 Clinton employees Ronald Rushing and Chris Cannon did the majority of work with the Clinton wastewater contract; they worked approximately 860 hours on Clinton wastewater. These employees are now spending their time maintaining and repairing the water system.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-43:**

Refer to the Kilbane Testimony, page 13, lines 8 – 12, regarding the level of maintenance testing expense projected for the base year and test year and reflected in the Application, Exhibit 29.8 as being based on the amount recorded for the 12 months ended March 31, 2022. Refer also to the response to the Attorney General's First Request, Item 81 that details \$14,268 spent on testing in 2021 related to the Clinton wastewater contract that ended effective December 31, 2021.

- a. Provide a breakdown of the amounts in each account listed in the Application, Exhibit 29.8 during the 12 months ending March 31, 2022, associated with the Clinton wastewater services, for all other services, and in total.
- b. Were testing expenses related to the Clinton wastewater services incurred during 2021 removed from the expense total for the 12 months ending March 31, 2022, in the reflection of base year and test year expenses? If so, how much was removed? If not, explain why not.
- c. Provide the monthly amount of maintenance testing by account for each of the months January 2021 through March 2022 that are associated with the Clinton wastewater services.

**Response:**

- a. The amounts in the application in Exhibit 29.8 are not 12 months ending March 31, 2022. The base period ends September 30, 2022. Both the 6 months ending March 31, 2022 and the 6- month forecasted period have no dollars related to sewer testing in Clinton.
- b. Please see clarification in item's 1 response to the 12-month reference. The costs for Clinton sewer have a different utility account than water and were removed when preparing the Revenue

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

Requirement. For the 6 months ending March 31, 2022, \$3,184.20 were excluded from the application.

c. Please see Clinton Sewer testing dollars by month listed below

	Clinton Sewer testing
Jan-2021	359
Feb-2021	-
Mar-2021	2,989
Apr-2021	2,156
May-2021	-
Jun-2021	-
Jul-2021	-
Aug-2021	1,230
Sep-2021	4,502
Oct-2021	725
Nov-2021	1,230
Dec-2021	1,230
Jan-2022	-
Feb-2022	-
Mar-2022	-

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
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**AG DR 2-44:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 70, Excel file AG DR 1-70 ADIT Rollforward, which shows a rollforward of ADIT amounts by temporary difference through the end of June 2022. Refer also to Water Service Kentucky's response to the Attorney General's First Request, Item 72, Excel file

AG\_DR\_1-072\_-\_Exhibits\_10-20-28\_-\_Schedule\_A\_-\_  
\_Rate\_Base\_Components\_Updated\_7.28.22.

a. Confirm that the only changes made to the projection of ADIT balances to include in rate base for the test year related to the differences projected for book vs. tax depreciation that occurred after the end of 2021. If not confirmed, explain and provide a schedule showing the 13 months of data by temporary difference for state and federal ADIT included in the test year.

b. Refer to debit balances of federal and state ADIT associated with bad debt that are reflected throughout the months during 2022 of \$66,133.41 and \$18,083.87, respectively. Explain how those amounts were determined and describe the temporary difference they are related to in detail.

c. Refer to debit balances of federal and state ADIT associated with bad debt that are reflected throughout the months during 2022 of \$66,133.41 and \$18,083.87, respectively. Indicate whether the temporary difference(s) related to each balance is removed from rate base. If not, describe why the ADIT should be reflected in rate base when the associated temporary difference is not.

d. Refer to the debit balances of federal and state ADIT applicable to Net Operating Loss ("NOL") Carryforward amounts reflected throughout all of the months from December 2020 through June 2022 of \$115,535.69 and \$212,992.41, respectively. Describe the major reasons why

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the federal and state NOL Carryforward amounts resulted and explain why the amounts reflected for ADIT do not change for any of the months reflected. In particular, explain why the state NOL ADIT amount is so high.

e. Refer to the debit balances of federal and state ADIT applicable to NOL Carryforward amounts reflected throughout all of the months from December 2020 through June 2022 of \$115,535.69 and \$212,992.41, respectively. Provide a schedule that shows the derivation of each of the federal and state NOL carryforward amounts and utilization activity of each by year since the NOL carryforwards with remaining balances were created.

**Response:**

- a. Confirmed, please see response to AG DR 2-40.
- b. These are related to activity in the bad debt reserve taken as an expense for book purposes but are not currently allowed for tax purposes. The tax deduction is only allowed when the actual accounts receivable is written off. The 2020 and 2021 journal entry support are provided for the computation, please see attached file AG DR 2-44 ADIT Calculations.xlsx.
- c. These temporary differences and their resulting impacts in ADIT as of 12/31/2021 are not removed from rate base. Please see file referenced above attached in response to AG DR 1-72, Pro-forma UPIS-AD-ADIT tab, cells S501 and S502, which tie to the 12/31/2021 rollforward Federal and State ADIT balances.
- d. The major reason why the federal and state NOLs were generated were because of federal bonus depreciation in the past years; in addition, any deferred charges and rate case being capitalized and amortized for regulatory purposes are deductible for tax purposes in the year incurred. These 3 items together provided additional tax deductions in the earlier



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years. The amounts reflected for ADIT do not change for any of the months reflected due to the fact that the federal NOL is part of a consolidated filing and hence utilized by other regulated/non-regulated entities within the consolidated group; that movement entry is booked at the parent company level. Similarly for the Kentucky NOL – Kentucky was required to file as a unitary filing starting with the 2019 return and the KY NOLs are being utilized by other regulated/non-regulated entities within the unitary group.

- e. Please see attached file AG DR 2-44 ADIT Calculations.xlsx.

**Witness:** Don Hong

Case No. 2022-00147  
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**AG DR 2-45:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Items 86 and 87, and Excel file AG DR 1-87 Bad Debt history.

- a. Provide an expanded version of the Excel table in cell rows 14-20 based on the format requested by the Commission Staff showing the beginning and ending bad debt reserve amounts and including all activity to include 2017, 2018, 2019, and 2022 activity through June 2022.
- b. Provide the amount of total service revenue for each month in 2022 and summed for the first six months of 2022.

**Response:**

Please see Excel file AG DR 2-45 Bad debt history and their respective tabs.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
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**AG DR 2-46:**

Refer to the July 2021 trial balance in Water Service Kentucky's response to the Attorney General's First Request, Item 77, Excel attachment AG 1-077. Refer further to the net balance addition of \$152,243.89 in account 627300 in cell row 1086 and in cell column P, bringing the total amount of this uncollectible expense account up to \$173,694.91 as of that point in 2021. Describe all reasons why the expense amount was debited with so much additional expense in July 2021 and provide copies of the journal entry(ies) and related workpapers used to record that entry(ies) for all entries made to that account in July 2021.

**Response:**

The reason the expense was so high in July 2021 was the AR aging balance for 180 Plus days from June to July of 2021 increased greatly so as to require a JE to increase the bad debt reserve. The JE and calculation that was used to record the entry is attached in Excel file AG DR 2-46 please see tabs JE and CCB aging schedule.

**Witness:**

James Kilbane

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Water Service Corporation of Kentucky  
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**AG DR 2-47:**

Refer to the Application generally. Provide the Company's accounts receivable aging balances at the end of each year 2017 through 2021 and through June 2022 divided into categories 0 – 30 days, 31 – 60 days, 61 – 90 days, 91 – 120 days, and over 120 days.

**Response:**

The company does not keep track or separate AR balances by some of the above categories, but has readily available a report that contains 0-30, 31-60, 61-90, 91-180, and 180+ days outstanding.

Please see attached file AG DR 2-47 AR Aging.xlsx.

**Witness:** James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
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**AG DR 2-48:**

Refer to the Application generally. Provide copies of all analyses available that details the Company's average collection lag of two recent monthly periods within the last year.

**Response:**

The Company objects to this question as vague and ambiguous. The Company presumes that this question is in relation to AR aging. Subject to and without waiving the foregoing objection, please see response to AG DR 2-47.

**Witness:**

James Kilbane

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Water Service Corporation of Kentucky  
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**AG DR 2-49:**

Refer to the Application generally. Explain how the Company determines the amount of bad debt provision to record each month and provide an example of the June 2022, December 2021, and December 2020 calculation as examples in electronic format with all formulas intact.

**Response:**

We provide an allowance for certain AR balances that are deemed to be potentially uncollectible. Please see attached spreadsheets AG DR 2-49 12-2021 Bad Debt, AG DR 2-49 12-2020 Bad Debt, and AG DR 2-49 06-2022 Bad Debt for the examples requested.

**Witness:** James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
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**AG DR 2-50:**

Refer to the Application generally. Describe all changes in the Company's calculation of its bad debt provision that have occurred since 2017. If none, so state. If changes did occur indicate when each one occurred and why.

**Response:**

None

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
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**AG DR 2-51:**

Refer to the Application generally. Provide a copy(ies) of all internal policies and procedures in place related to the recordation of bad debt expense.

**Response:**

Please see attached.

**Witness:**

James Kilbane



## Allowance for Doubtful Accounts

(updated July 2011)

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Accounts receivable are reported in the financial statements at net realizable value which is equal to the gross amount of accounts receivable less an estimated allowance for doubtful accounts.

Two common procedures of accounting for bad debts are the direct write-off method and the allowance method. The weakness of the direct write-off method is that bad debt expense is not matched with the related revenues and that accounts receivable are overstated because no attempt is made to account for the unknown bad debts included in accounts receivable. The direct method is not acceptable under GAAP.

The Company uses the allowance method, whereby a percentage of ending accounts receivable is estimated to eventually prove uncollectible even though the specific uncollectible receivables cannot be identified. When specific accounts are written off, they are charged to the allowance account, which is periodically recomputed. In practice, customer accounts are only written-off after a final bill is issued upon service termination and outstanding for 210 days (180 days past due).

Beginning in 2009 (and following the conversion to JD Edwards and CC&B), the Company enhanced its estimation techniques establishing unique percentages to all outstanding balances based on their aging. Previously, an allowance was only provided on balances that had aged greater than 90 days. In addition, an allowance is now calculated for all companies, whereas this had previously only been done for "availability" accounts. Availability accounts are those where customers have water service available to them but have not yet begun to actually use water. Even though the customers may not use any water, they are billed a monthly base charge. This situation is typical where land has been purchased for later development.

Since past due balances are not written off until they have aged 210 days, the allowance percentages applied to each aging category cannot effectively be traced into historical records. In order to gain comfort with these percentage, the Company has conducted a comprehensive evaluation of the overall allowance for doubtful accounts which included the following:

*Compare bad debt expense to write-offs.* Bad debt expense recorded in a specific year implies the necessity for write-offs during that year and subsequent years. While it is unrealistic to expect estimated bad debt expense to perfectly match actual write-offs in a given year, it is reasonable to expect the ratio of bad debt expense to write-offs to be close to 1.0 over an extended period.

*Compare beginning allowance for doubtful accounts to write-offs.* This ratio is computed each year using the beginning-of-year allowance for doubtful accounts as the numerator and write-offs of accounts receivable during the year as the denominator. The beginning allowance-allowance-

## Allowance for Doubtful Accounts

(updated July 2011)

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to-write-off ratio indicates how adequately the allowance accommodated subsequent write-offs.

*Assess the allowance exhaustion rate.* Exhaustion rates indicate the time (expressed in years) taken to use the beginning-of-year allowance in the form of actual write-offs

Based on this evaluation, the Company has determined that the allowance for doubtful accounts is adequately stated.

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-52:**

Refer to the Application generally. Describe any changes made to the Company's policy on past due accounts resulting from the ramifications of Covid-19 involving such things as delays in disconnections and collections, or debt forgiveness.

**Response:**

These were the actions taken in Kentucky related to COVID-19:

03/11/2020 - Suspended all collections and severance activities in Kentucky.

01/06/2021 – Per Kentucky Order, all Kentucky customers with delinquent debt were automatically placed on a 24-month deferred payment arrangement to assist customers with paying their utility bills.

10/30/2021 – Resumed all collection and severance activities in Kentucky.

**Witness:**

James Kilbane

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Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-53:**

Refer to the Application generally. Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 99. Provide the calculation of the \$14,152 base period uninsured losses expense amount for the Company using the historic averages described in the response.

**Response:**

The Total Uninsured losses for the Company is calculated based on historic averages and allocation is based on ERC count by State. The Total Uninsured losses for the Base Period was \$607,088, based on a 2016-2019 average of \$572,724 used for 2021 and an 8% increase forecasted for 2022. WSCK's ERC count forecasted was 7,056 or approximately 2.33% of the total ERC count company wide. \$607,088 multiplied by 2.33% results in \$14,152.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
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**AG DR 2-54:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 80 in regard to the legal expenses in 2021 exceeding those in 2020 by approximately \$20,000 due to "higher activity in increasingly complex legal matters." Refer also to Water Service Kentucky's response to the Attorney General's First Request, Items 82 and 84, and the Excel file AG\_DR\_1-82\_ and\_ 84\_ IS\_ and\_ DS, and further to the worksheet tab Outside Service which shows large increases of legal expense in account 540400 in 2020 of over 300% and increases in 2021 of another nearly 300%.

- a. Describe the "higher activity in increasingly complex legal matters" in more detail and whether those matters are projected to be recurring in nature in 2022 and 2023.
- b. Provide copies of all legal bills used to record expenses in 2020 and in 2021.
- c. Describe all legal matters that were new in both 2020 and 2021 compared to prior years.
- d. Indicate whether any of the legal costs that were incurred during 2020 or 2021 related to the termination of the Clinton Wastewater contract. If so, provide a list of all such expenses by firm and year recorded.
- e. Provide the amount of legal fee expenses in account 540400 recorded thus far in 2022 by month.

**Response:**

- a. WSCK incurred legal expenses in 2021 and 2022 related to a personal-injury lawsuit and the termination of the Clinton wastewater contract. Although both of these matters have been resolved, utilities frequently have litigation and transactional legal expenses. In addition, WSCK

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

incurred legal expenses related to regulatory services, property rights, the provision of service to customers. These types of legal issues are recurring.

b. Please see attached file, which has been redacted in order to protect attorney-client communications.

c. Please see response to a.

d. Please see response to a. The firm Sturgill, Turner, Barker, and Moloney incurred \$4,794 in legal bills related to the Clinton wastewater contract.

e. Please see below for 2022 legal expenses by month

Accounts	Jan-2022	Feb-2022	Mar-2022	Apr-2022	May-2022	Jun-2022	Jul-2022	Aug-2022
540400 - Legal	\$ (3,969)	\$ -	\$ -	\$ -	\$ 10,423	\$ 138	\$ -	\$ 18,561

**Witness:** James Kilbane

\$840

**Travis, Pruitt & Powers**  
207 East Mt Vernon Street  
PO Drawer 30  
Somerset, KY 42502-0030

Rob Guttormsen  
Digitally signed by Rob Guttormsen  
DN: cn=Rob Guttormsen, o=Travis, Pruitt & Powers, ou=Travis, Pruitt & Powers, email=rguttormsen@travispruitt.com, c=US

Justin Kersey  
Digitally signed by Justin Kersey  
DN: cn=Justin Kersey, o=Travis, Pruitt & Powers, ou=Travis, Pruitt & Powers, email=jkersey@travispruitt.com, c=US

Ph: 606.679.7345

Fax: 606.678.0411

Corix Group of Companies  
500 W. Monroe Street  
Suite 3600  
Chicago, IL 60661

Date: April 3, 2020

Batch 367126

Federal ID#: [REDACTED]

Attention:

Doc 1165252

File #: [REDACTED]

Inv #: 1861

RE: Suite File#: F022020; Defendant: Water Service Corporation of Kentucky;  
Plaintiff: Jessica Marie Case; DOL: 05-01-2019; Venue: Bell Circuit Court,  
Kentucky

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Feb-25-20	Receipt and Review of email with complaint from [REDACTED]	0.20	40.00	JTP
	Wrote letter to plaintiff's counsel re: extension of time to file answer	0.30	60.00	JTP
Feb-26-20	Prepared draft answer to complaint	1.00	200.00	JTP
Feb-28-20	Received call from plaintiff's counsel re: extension of time to file answer / claim	0.20	40.00	JTP
	Prepared email to [REDACTED]	0.20	40.00	JTP
	Prepared email to Atty. Ray Jones re: claim/answer	0.10	20.00	JTP
Mar-03-20	Receipt and Review of email from client re: [REDACTED]	0.10	20.00	JTP
	Prepared email to co-defendant's counsel [REDACTED]	0.20	40.00	JTP
	Receipt and Review of email [REDACTED]	0.20	40.00	JTP
	Prepared email to Shawn Ellcegui with copy of executed engagement letter	0.10	20.00	JTP
Mar-04-20	Researched [REDACTED]	0.50	100.00	JTP

\$1,560

Justin Kersey  
Digitally signed by Justin Kersey  
DN: cn=Justin Kersey, o=Justin Kersey  
Reason: I am approving this document  
Date: 2020.05.12 11:45:40  
Full Name: Justin Kersey

**Travis, Pruitt & Powers**  
207 East Mt Vernon Street  
PO Drawer 30  
Somerset, KY 42502-0030

Rob Gutformse  
Ph: 606.679.7345  
n

Fax: 606.678.0411

Corix Group of Companies  
500 W. Monroe Street  
Suite 3600  
Chicago, IL 60661

Date: May 12, 2020  
Federal ID#: [REDACTED]

File #: [REDACTED]  
Inv #: 1904

RE: Suite File#: F022020; Defendant: Water Service Corporation of Kentucky;  
Plaintiff: Jessica Marie Case; DOL: 05-01-2019; Venue: Bell Circuit Court,  
Kentucky

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Apr-02-20	Communicate/With Client Analysis/Strategy - [REDACTED];	0.20	40.00	JTP
	Communicate/With Client Analysis/Strategy - prepared responsive email [REDACTED]	0.20	40.00	JTP
Apr-03-20	Communicate/Other Outside Counsel Analysis/Strategy- telephone call to plaintiff's counsel re: [REDACTED]	0.20	40.00	JTP
	Review/Analyze Pleadings- received and reviewed [REDACTED]	0.10	20.00	JTP
Apr-06-20	Review/Analyze Written discovery- received and reviewed [REDACTED]	0.30	60.00	JTP
Apr-08-20	Communicate/Other External Written discovery - wrote letter to [REDACTED]	1.00	200.00	JTP
	Draft/revise Written discovery - prepared draft answers [REDACTED]	0.50	100.00	JTP
Apr-13-20	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed email from counsel for defendant Middlesboro and sent reply email [REDACTED]	0.10	20.00	JTP



	Draft/revise Written discovery - prepared draft discovery requests to plaintiff	2.00	400.00	JTP
	Draft/revise Written discovery- prepared written discovery to co-defendant Middlesboro	1.00	200.00	JTP
Apr-14-20	Draft/revise Written discovery- prepared written discovery to co-defendant, Wilder Construction	1.00	200.00	JTP
Apr-15-20	Communicate/With Client Written discovery - wrote letter to client representative [REDACTED]	0.30	60.00	JTP
Apr-24-20	Communicate/With Client Analysis/Strategy- received and reviewed email from client representative and sent reply email [REDACTED]	0.10	20.00	JTP
Apr-27-20	Communicate/With Client Analysis/Strategy - conference call [REDACTED]	0.50	100.00	JTP
	Communicate/With Client Analysis/Strategy - received and reviewed email from [REDACTED]	0.20	40.00	JTP
Apr-28-20	Communicate/Other Outside Counsel Analysis/Strategy - prepared email to plaintiff's counsel [REDACTED]	0.10	20.00	JTP
Totals		7.80	\$1,560.00	

**FEE SUMMARY:**

Lawyer	Hours	Effective Rate	Amount
John T. Pruitt Jr	7.80	\$200.00	\$1,560.00

**Total Fees & Disbursements**

Previous Balance

\$840.00

Previous Payments

\$0.00

**Balance Due Now**

**\$2,400.00**

**Make Checks Payable to: Travis, Pruitt & Powers**

[REDACTED]

**\$1,560.00** OK RG



**Travis, Pruitt & Powers**  
 207 East Mt Vernon Street  
 PO Drawer 30  
 Somerset, KY 42502-0030

**Rob Guttormsen**  
  
**Justin Kersey**

Digitally signed by Rob Guttormsen  
 DN: cn=US, ou=Kersey Mid Atlantic Operations,  
 o=Coxs Group of Companies, cn=Rob  
 Guttormsen  
 E=rob.guttormsen@coxs.com  
 Reason: I am the signer of this document  
 Location: your signing location here  
 Date: 2020.10.14 18:17:35 -0500  
 Full Photo: PDF Version: 10 1 0

Digitally signed by Justin Kersey  
 DN: cn=US, ou=Kersey Mid Atlantic, Inc, cn=Justin  
 Kersey, e=justin.kersey@coxs.com  
 Reason: I am the signer of this document  
 Location: your signing location here  
 Date: 2020.10.14 15:22:26  
 Full Photo: PDF Version: 000

Ph: 606.679.7345

Fax: 606.678.0411

\$2,980

Coxs Group of Companies  
 500 W. Monroe Street  
 Suite 3600  
 Chicago, IL 60661

Date: August 18, 2020

Federal ID#: [REDACTED]

File #: [REDACTED]

Inv #: 2000

Attention:

RE: Suite File#: F022020; Defendant: Water Service Corporation of Kentucky;  
 Plaintiff: Jessica Marie Case; DOL: 05-01-2019; Venue: Bell Circuit Court,  
 Kentucky

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
May-08-20	Communicate/With Client Analysis/Strategy - received and reviewed letter [REDACTED]	0.10	20.00	JTP
	Communicate/Other External Analysis/Strategy - received and reviewed email [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - telephone call to plaintiff's counsel re: meeting (lvm)	0.10	20.00	JTP
	Communicate/With Client Analysis/Strategy - prepared email to client [REDACTED]	0.10	20.00	JTP
May-11-20	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed email from co-defendant's counsel and sent reply email (2nd email)	0.20	40.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - prepared email to plaintiff's counsel re: site inspection	0.10	20.00	JTP
	Communicate/Other Outside Counsel Written discovery - received and reviewed email from co-defendant's counsel and sent reply email re: discovery / depositions of parties	0.30	60.00	JTP
May-13-20	Communicate/Other Outside Counsel	0.10	20.00	JTP

	Analysis/Strategy - received and reviewed email from counsel and sent reply email re: site inspection			
	Draft/revise Written discovery - prepared revisions to discovery to co-defendant Wilder Construction	0.50	100.00	JTP
May-14-20	Communicate/With Client Analysis/Strategy- received and reviewed email from [REDACTED]	0.20	40.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed email from plaintiff's counsel re: confirmation of inspection; and forwarded email [REDACTED]	0.10	20.00	JTP
May-26-20	Communicate/Other Outside Counsel Written discovery- received and reviewed letter from co-defendant, Wilder Construction, counsel and reviewed discovery	0.20	40.00	JTP
	Communicate/With Client Written discovery - wrote [REDACTED]	0.40	80.00	JTP
May-28-20	Communicate/Other Outside Counsel Analysis/Strategy - received call from plaintiff's counsel [REDACTED]	0.10	20.00	JTP
	Communicate/Other External Analysis/Strategy - prepared email and received reply email re: site inspection	0.20	40.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed email from counsel and sent reply email [REDACTED]	0.10	20.00	JTP
May-29-20	Communicate/Other Outside Counsel Analysis/Strategy - received call from plaintiff's counsel [REDACTED]	0.30	60.00	JTP
Jun-09-20	Communicate/With Client Analysis/Strategy - prepared email to client representative and insurer [REDACTED]	0.10	20.00	JTP
Jun-10-20	Review/Analyze Written discovery- received and reviewed co-defendant Wilder Construction's answers to co-defendant Middlesboro's discovery requests	0.30	60.00	JTP
	Review/Analyze Document Production- received and reviewed inspection report / photographs	0.30	60.00	JTP



Jun-11-20	Communicate/Other External Analysis/Strategy - wrote letter [REDACTED]	0.70	140.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - wrote letter to plaintiff's counsel [REDACTED]	0.40	80.00	JTP
	Review/Analyze Analysis/Strategy - received and reviewed email from City of Middlesboro's counsel and sent reply email	0.20	40.00	JTP
Jun-12-20	Review/Analyze Written discovery - reviewed plaintiff's written discovery to Water Services Corporation	0.30	60.00	JTP
Jun-16-20	Review/Analyze Written discovery- received and reviewed second set of discovery requests from co-defendant Middlesboro	0.20	40.00	JTP
Jun-19-20	Communicate/With Client Written discovery - wrote letter [REDACTED]	0.50	100.00	JTP
	Draft/revise Written discovery - prepared answers to plaintiff's written discovery	1.50	300.00	JTP
Jun-26-20	Communicate/With Client Analysis/Strategy- telephone [REDACTED]	0.30	60.00	JTP
Jun-29-20	Draft/revise Written discovery - prepared Interrogatories and requests for production of documents to plaintiff	1.50	300.00	JTP
Jul-01-20	Communicate/With Client Written discovery - prepared email [REDACTED]	0.10	20.00	JTP
	Draft/revise Written discovery - prepared revisions to interrogatories and documents requests to plaintiff	0.40	80.00	JTP
Jul-07-20	Communicate/Other External Analysis/Strategy - telephone call [REDACTED]	0.10	20.00	JTP
Jul-16-20	Communicate/With Client Written discovery - prepared email [REDACTED]	0.10	20.00	JTP
Jul-17-20	Communicate/With Client Analysis/Strategy - received and reviewed email from [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Analysis/Strategy - received and reviewed multiple emails [REDACTED]	0.20	40.00	JTP

	Review/Analyze Analysis/Strategy- received and reviewed email [REDACTED]	1.00	200.00	JTP
	Communicate/With Client Written discovery - [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Written discovery - telephone [REDACTED]	0.50	100.00	JTP
Jul-22-20	Communicate/With Client Analysis/Strategy - prepared email [REDACTED]	0.10	20.00	JTP
	Draft/revise Written discovery - prepared answers to plaintiff's discovery requests; prepared answers to co-defendant Wilder Construction's discovery requests; and prepared answers to co-defendant City of Middlesboro discovery requests (2 sets)	2.50	500.00	JTP
Jul-29-20	Review/Analyze Pleadings - received and reviewed order allowing defendant Wilder to obtain authorization from plaintiff	0.10	20.00	JTP
Jul-31-20	Communicate/With Client Written discovery - received and reviewed email from [REDACTED]	0.10	20.00	JTP
<b>Totals</b>		<b>14.90</b>	<b>\$2,980.00</b>	

FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
John T. Pruitt Jr	14.90	\$200.00	\$2,980.00

**Total Fees & Disbursements**

**\$2,980.00**

Previous Balance

\$2,400.00

Previous Payments

\$2,400.00

**Balance Due Now**

**\$2,980.00**

**Make Checks Payable to: Travis, Pruitt & Powers**

[REDACTED]



**Travis, Pruitt & Powers**  
 207 East Mt Vernon Street  
 PO Drawer 30  
 Somerset, KY 42502-0030

**Rob Guttormsen**  
  
**Justin Kersey**

Digitally signed by Rob Guttormsen  
 DN: cn=Rob Guttormsen, o=Travis, Pruitt & Powers, ou=Travis, Pruitt & Powers, email=rguttormsen@travispruitt.com, c=US  
 Digitally signed by Justin Kersey  
 DN: cn=Justin Kersey, o=Travis, Pruitt & Powers, ou=Travis, Pruitt & Powers, email=jkersey@travispruitt.com, c=US  
 Reason: I am approving the document  
 Location: your signing location here  
 Date: 2020.10.12 21:21:05 -0400  
 Foxit Reader PDF Version: 5.0.1.0

\$1,080

Ph: 606.679.7345 Fax: 606.678.0411

Corix Group of Companies  
 500 W. Monroe Street  
 Suite 3600  
 Chicago, IL 60661

Date: October 12, 2020  
 Federal ID#: [REDACTED]

Attention:

File #: [REDACTED]  
 Inv #: 2073

RE: Suite File#: F022020; Defendant: Water Service Corporation of Kentucky;  
 Plaintiff: Jessica Marie Case; DOL: 05-01-2019; Venue: Bell Circuit Court,  
 Kentucky

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Aug-04-20	Communicate/With Client Analysis/Strategy - prepared email [REDACTED]	0.10	20.00	JTP
	Review/Analyze Analysis/Strategy - received and reviewed email [REDACTED] es	0.10	20.00	JTP
Aug-07-20	Communicate/With Client Written discovery - received and reviewed email [REDACTED]	0.10	20.00	JTP
Aug-17-20	Communicate/With Client Written discovery - prepared email to [REDACTED]	0.10	20.00	JTP
Aug-24-20	Review/Analyze Written discovery- reviewed City of Middlesboro discovery responses to Wilder Construction requests	0.50	100.00	JTP
	Review/Analyze Written discovery- reviewed City of Middlesboro discovery responses to plaintiff's requests	0.50	100.00	JTP
Sep-14-20	Review/Analyze Written discovery - received and reviewed co-defendant Wilder answers to Middlesboro discovery	0.30	60.00	JTP
Sep-15-20	Communicate/Other Outside Counsel Written discovery - received call from Atty. Ray Jones re: discovery	0.10	20.00	JTP



	Communicate/Other Outside Counsel Written discovery- prepared email to all counsel [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Written discovery- prepared email [REDACTED]	0.10	20.00	JTP
Sep-16-20	Draft/revise Written discovery - prepared revisions to discovery responses to plaintiff and co-defendant Middlesboro's discovery requests	0.50	100.00	JTP
	Draft/revise Written discovery- prepared final draft of all discovery requests to plaintiff and co-defendants and prepared email [REDACTED]	1.00	200.00	JTP
Sep-18-20	Communicate/Other Outside Counsel Analysis/Strategy [REDACTED] prepared email to all counsel re: photographs	0.10	20.00	JTP
	Communicate/Other Outside Counsel Written discovery- received and reviewed email from co-defendant's counsel and sent reply [REDACTED]	0.20	40.00	JTP
	Draft/revise Written discovery - prepared draft Interrogatory answers to Wilder Construction discovery	1.00	200.00	JTP
Sep-22-20	Communicate/With Client Written discovery- wrote letter [REDACTED]	0.40	80.00	JTP
Sep-24-20	Communicate/Other Outside Counsel Written discovery- received and reviewed email from Middlesboro attorney and sent reply email re: Interrogatory answers	0.10	20.00	JTP
Sep-30-20	Communicate/Other Outside Counsel Written discovery- prepared email to all counsel re: discovery responses to Middlesboro (3 sets)	0.10	20.00	JTP
<b>Totals</b>		<b>5.40</b>	<b>\$1,080.00</b>	

FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
John T. Prullt Jr	5.40	\$200.00	\$1,080.00

**Total Fees & Disbursements**

**\$1,080.00** CHECK

Previous Balance

\$2,980.00

Previous Payments

\$0.00

**Balance Due Now**

**\$4,060.00**

**Make Checks Payable to: Travis, Prultt & Powers**





\$680

**Travis, Pruitt & Powers**  
207 East Mt Vernon Street  
PO Drawer 30  
Somerset, KY 42502-0030

**Rob Guttormsen**

Digitally signed by Rob Guttormsen  
DN: C=US, OU=Midwest/Mid-Atlantic  
Operations, O=Corix Group of Companies,  
CN=Rob Guttormsen,  
E=rob.guttormsen@corixgroup.com  
Reason: I am the author of this document  
Location: your signing location here  
Date: 2021.01.19 01:24:55-0600  
Foxit PhantomPDF Version: 10.1.1

Ph: 606.679.7345

Fax: 606.678.0411

Corix Group of Companies  
500 W. Monroe Street  
Suite 3600  
Chicago, IL 60661

Date: December 4, 2020  
Federal ID# [REDACTED]

Attention:

File #: [REDACTED]  
Inv #: 2117

RE: Suite File#: F022020; Defendant: Water Service Corporation of Kentucky;  
Plaintiff: Jessica Marie Case; DOL: 05-01-2019; Venue: Bell Circuit Court,  
Kentucky

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Oct-06-20	Communicate/Other Outside Counsel Depositions - wrote letter to plaintiff's counsel re: depositions / plan	0.30	60.00	JTP
Oct-30-20	Review/Analyze Dispositive Motions - received and reviewed City of Middlesboro's motion for summary judgment	0.30	60.00	JTP
Nov-02-20	Draft/revise Pleadings - prepared response to City of Middlesboro's motion for summary judgment	0.30	60.00	JTP
	Review/Analyze Dispositive Motions - received and reviewed co-defendant's notice of motion for summary judgment; and reviewed [REDACTED]	0.30	60.00	JTP
	Communicate/With Client Dispositive Motions - wrote letter to client [REDACTED]	0.30	60.00	JTP
Nov-12-20	Communicate/Other Outside Counsel Written discovery - received and reviewed email from co-defendant's counsel and sent reply email re: discovery	0.20	40.00	JTP
Nov-13-20	Communicate/Other Outside Counsel Written discovery - wrote letter to counsel re: Wilder discovery responses	0.40	80.00	JTP
Nov-20-20	Review/Analyze Dispositive Motions - received and	0.50	100.00	JTP

reviewed plaintiff's response to co-defendant's motion for summary judgement - review [REDACTED]

Nov-23-20	Appear for/Attend Dispositive Motions - Court appearance on City of Middlesboro's motion for summary judgment - via Zoom	0.30	60.00	JTP
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	Communicate/Other External Dispositive Motions - wrote letter to [REDACTED]	0.40	80.00	JTP
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Nov-25-20	Review/Analyze Written discovery- received and reviewed plaintiff's requests for admissions, interrogatories and documents requests to City	0.10	20.00	JTP
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Totals		3.40	\$680.00	
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FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
John T. Pruitt Jr	3.40	\$200.00	\$680.00

<b>Total Fees &amp; Disbursements</b>	<b>\$680.00</b>
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Previous Balance	\$4,060.00
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Previous Payments	\$0.00
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<b>Balance Due Now</b>	<b>\$4,740.00</b>
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**Make Checks Payable to: Travis, Pruitt & Powers**

\$1,560

**Travis, Pruitt & Powers**  
207 East Mt Vernon Street  
PO Drawer 30  
Somerset, KY 42502-0030

Ph: 606.679.7345

Fax: 606.678.0411

Corix Group of Companies  
500 W. Monroe Street  
Suite 3600  
Chicago, IL 60661

Date: May 11, 2021

Federal ID#:

54  
File #:

Inv #:

2290

Attention: [REDACTED]  
RE: Suite File#: F022020; Defendant: Water Service Corporation of Kentucky;  
Plaintiff: Jessica Marie Case; DOL: 05-01-2019; Venue: Bell Circuit Court,  
Kentucky

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Dec-10-20	Review/Analyze Pleadings- received and reviewed Court order: [REDACTED]	0.10	20.00	JTP
Dec-14-20	Review/Analyze Pleadings- received and reviewed co-defendant's withdrawal of motion	0.10	20.00	JTP
Dec-15-20	Communicate/Other Outside Counsel Depositions- received and reviewed email from counsel and replied re: schedule depositions	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions- received and reviewed reply email from counsel re: cost share in depositions	0.10	20.00	JTP
	Communicate/Other External Depositions- prepared email to company representative re: depositions	0.20	40.00	JTP
Dec-16-20	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed email from plaintiff's counsel	0.10	20.00	JTP
	Communicate/Other External Depositions- received and reviewed email from Allen Willt and sent reply email re: deposition / representative	0.20	40.00	JTP
	Communicate/With Client Depositions - received and reviewed email [REDACTED]	0.10	20.00	JTP

	Communicate/Other Outside Counsel Depositions- prepared email to co-defendant's counsel re: cost share for depositions	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions- prepared email to counsel re: deposition availability	0.10	20.00	JTP
Dec-17-20	Communicate/Other Outside Counsel Depositions - received and reviewed email from co-defendant's counsel re: depositions	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions - prepared email to counsel re: depositions	0.20	40.00	JTP
Dec-18-20	Review/Analyze Written discovery- received and reviewed co-defendant's response to plaintiff's requests for admissions	0.10	20.00	JTP
Mar-03-21	Communicate/Other Outside Counsel Depositions - received and reviewed email from co-defendant, City of Middlesboro's, counsel re: deposition	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions - prepared email to [REDACTED]	0.20	40.00	JTP
	Communicate/Other Outside Counsel Depositions - received and reviewed email from co-defendant's counsel re: plaintiff deposition	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions - prepared email to counsel re: deposition dates	0.10	20.00	JTP
Mar-04-21	Review/Analyze Depositions - received and reviewed multiple emails from various counsel re: dates/times to set depositions of parties / witnesses	1.00	200.00	JTP
Mar-05-21	Communicate/Other Outside Counsel Written discovery- prepared email to co-defendant's counsel re: plaintiff discovery responses	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions- received and reviewed email from co-defendant, City of Middlesboro's, counsel and sent reply re: deposition of plaintiff	0.20	40.00	JTP
Mar-08-21	Review/Analyze Analysis/Strategy- reviewed plaintiff's discovery responses for damages re: analysis to insured; and prepared email to insured client	0.50	100.00	JTP
Mar-29-21	Communicate/Other Outside Counsel Depositions - received and reviewed email from counsel and sent reply email re: deposition dates	0.20	40.00	JTP



	Communicate/Other Outside Counsel Depositions - received and reviewed emails from co-defendant's counsel re: deposition dates	0.20	40.00	JTP
	Communicate/Other Outside Counsel Depositions - prepared email to counsel and reviewed reply emails re: deposition availability	0.20	40.00	JTP
Mar-31-21	Review/Analyze Analysis/Strategy- reviewed [REDACTED]	2.00	400.00	JTP
	Communicate/Other Outside Counsel Depositions - received and reviewed email from plaintiff's counsel re: June 9th deposition	0.10	20.00	JTP
	Communicate/With Client Depositions - prepared email to client [REDACTED]	0.20	40.00	JTP
Apr-01-21	Communicate/With Client Depositions - received and reviewed email from [REDACTED]	0.20	40.00	JTP
	Communicate/Other Outside Counsel Depositions - prepared email to all counsel re: depositions	0.10	20.00	JTP
Apr-12-21	Communicate/Other Outside Counsel Depositions - wrote letter to plaintiff's counsel re: depositions	0.40	80.00	JTP
Apr-20-21	Communicate/Other Outside Counsel Depositions - received and reviewed emails from plaintiff's counsel and co-defendant's counsel re: zoom depositions	0.30	60.00	JTP
	Totals	7.80	\$1,560.00	

FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
John T. Pruitt Jr	7.80	\$200.00	\$1,560.00

**Total Fees & Disbursements**

\$1,560.00

Previous Balance

\$4,740.00

Previous Payments

\$4,740.00

**Balance Due Now**

\$1,560.00

**Make Checks Payable to: Travis, Pruitt & Powers**

JK

ok

Company	Department	Utility Type	Natural Account
2210	312005	10	540400

\$9,327

**Travis, Pruitt & Powers**  
 207 East Mt Vernon Street  
 PO Drawer 30  
 Somerset, KY 42502-0030

Ph: 606.679.7345

Fax: 606.678.0411

Corix Group of Companies  
 500 W. Monroe Street  
 Suite 3600  
 Chicago, IL 60661

Date: August 17, 2021  
 Federal ID#: [REDACTED]

Attention:

File #: [REDACTED]  
 Inv #: 2387

RE: Suite File#: F022020; Defendant: Water Service Corporation of Kentucky;  
 Plaintiff: Jessica Marie Case; DOL: 05-01-2019; Venue: Bell Circuit Court,  
 Kentucky

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
May-04-21	Communicate/Other Outside Counsel Depositions - prepared email to co-defendant's counsel and reviewed reply email re: deposition notice	0.10	20.00	JTP
May-05-21	Draft/revise Depositions- prepared notice of deposition of plaintiff via Zoom	0.30	60.00	JTP
	Draft/revise Depositions - prepared notice of deposition of witness Cooper via Zoom	0.30	60.00	JTP
	Draft/revise Depositions - prepared notice of deposition of witness Singarajah via Zoom	0.30	60.00	JTP
	Communicate/Other External Depositions - prepared email to court reporter re: zoom depositions on 6-9-21	0.10	20.00	JTP
	Review/Analyze Depositions - received and reviewed email from court reporter and replied re: 6-9-21 zoom depositions	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions - received and reviewed email from co-defendant's counsel and sent reply email re: deposition schedule	0.20	40.00	JTP
May-14-21	Communicate/Other Outside Counsel Depositions - received and reviewed emails from Atty. Owens and sent reply emails re: June 9th depositions	0.20	40.00	JTP
May-17-21	Communicate/Other Outside Counsel	0.10	20.00	JTP

	Analysis/Strategy - received call from Atty. Ray Jones [REDACTED]			
	Communicate/Other Outside Counsel Analysis/Strategy - prepared email to Atty. Ray Jones with [REDACTED]	0.10	20.00	JTP
May-24-21	Review/Analyze Depositions - received and reviewed plaintiff's deposition notices to defendants requesting documents to produce	0.20	40.00	JTP
	Review/Analyze Depositions- received and reviewed [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions - received and reviewed email from Middlesboro counsel re: Mayor deposition	0.10	20.00	JTP
May-26-21	Communicate/Other Outside Counsel Depositions - prepared email to all counsel/parties re: deposition time	0.10	20.00	JTP
	Communicate/With Client Depositions - wrote letter [REDACTED]	0.40	80.00	JTP
May-27-21	Communicate/With Client Depositions - received and reviewed email from client [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Depositions - received and reviewed reply email from client [REDACTED]	0.10	20.00	JTP
May-28-21	Communicate/With Client Depositions - received and reviewed email from client [REDACTED]	0.10	20.00	JTP
Jun-02-21	Communicate/With Client Depositions - received and reviewed email from [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Depositions - received and reviewed email from client [REDACTED]	0.20	40.00	JTP
	Appear for/Attend Depositions - attended Teams Meeting with clients [REDACTED]	1.00	200.00	JTP
	Communicate/Other Outside Counsel Depositions - prepared email to counsel re: Wilder deposition notice	0.20	40.00	JTP
	Review/Analyze Depositions- received and reviewed [REDACTED]	0.30	60.00	JTP



	Communicate/With Client Depositions - prepared email to [REDACTED]	0.10	20.00	JTP
Jun-04-21	Communicate/Other Outside Counsel Depositions - received and reviewed email from counsel and sent reply email re: confirmation / court reporter	0.20	40.00	JTP
Jun-07-21	Review/Analyze Depositions- received and reviewed email with link for depositions; and prepared email to [REDACTED]	0.20	40.00	JTP
	Review/Analyze Depositions- reviewed [REDACTED]	0.50	100.00	JTP
	Draft/revise Depositions- prepared documents production responses with documents to all counsel	0.50	100.00	JTP
	Review/Analyze Depositions - received and reviewed [REDACTED]	1.50	300.00	JTP
	Communicate/With Client Depositions - prepared email to [REDACTED]	0.20	40.00	JTP
	Draft/revise Depositions- prepared revised responses to plaintiff's deposition documents production requests	0.50	100.00	JTP
	Plan and prepare for Depositions - prepared for deposition [REDACTED]	1.50	300.00	JTP
Jun-08-21	Communicate/Other Outside Counsel Analysis/Strategy - conference call [REDACTED]	1.00	200.00	JTP
	Review/Analyze Analysis/Strategy- received and reviewed [REDACTED]	2.00	400.00	JTP
	Communicate/With Client Depositions - prepared email to [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions - prepared email to all counsel with response to plaintiff's document requests to be produced at deposition	0.10	20.00	JTP
	Communicate/Other External Depositions-	0.10	20.00	JTP

	telephone call [REDACTED] [REDACTED]			
	Plan and prepare for Depositions - prepared for deposition of witness - [REDACTED]	1.00	200.00	JTP
	Review/Analyze Depositions - received and reviewed City of Middlesboro documents requests responses; and prepared email to [REDACTED] [REDACTED]	0.80	160.00	JTP
Jun-09-21	Appear for/Attend Depositions - attended depositions of plaintiff, two witnesses and 3 defendant representatives; and conference with [REDACTED]	7.50	1,500.00	JTP
	Appear for/Attend Depositions - round trip travel time to Middlesboro for depositions and conference	4.00	800.00	JTP
Jun-10-21	Communicate/Other External Analysis/Strategy - received and reviewed email [REDACTED] [REDACTED]	0.20	40.00	JTP
Jun-11-21	Review/Analyze Analysis/Strategy- reviewed case law [REDACTED] [REDACTED]	1.00	200.00	JTP
Jun-23-21	Communicate/Other External Depositions - prepared [REDACTED] [REDACTED]; and wrote letter [REDACTED] [REDACTED]	4.00	800.00	JTP
Jun-24-21	Communicate/With Client Depositions - wrote letter [REDACTED]	1.00	200.00	JTP
Jun-28-21	Communicate/Other Outside Counsel Settlement/Non-binding ADR- received call from plaintiff's counsel re: mediation / depositions	0.20	40.00	JTP
Jul-01-21	Communicate/With Client Analysis/Strategy - wrote letter to [REDACTED] [REDACTED]	0.50	100.00	JTP
	Communicate/Other Outside Counsel Settlement/Non-binding ADR - wrote letter to plaintiff's counsel re: depositions / mediation / trial	0.50	100.00	JTP
Jul-02-21	Draft/revise Pleadings - prepared response to plaintiff's motion for trial	0.40	80.00	JTP
	Communicate/Other Outside Counsel Pleadings - wrote letter to plaintiff's counsel re: response/status	0.40	80.00	JTP

Jul-12-21	Communicate/With Client Analysis/Strategy - wrote letter to clients [REDACTED]	0.40	80.00	JTP
	Review/Analyze Pleadings - received and reviewed letter and proposed order from counsel re: mediation	0.30	60.00	JTP
	Appear for/Attend Dispositive Motions - Court appearance on motion for trial / mediation (via Zoom)	0.50	100.00	JTP
Jul-15-21	Review/Analyze Document Production - received and reviewed email from [REDACTED]	0.30	60.00	JTP
	Communicate/With Client Depositions - prepared email to [REDACTED]	0.10	20.00	JTP
	Review/Analyze Depositions- received and reviewed deposition transcript of plaintiff and plaintiff's two witnesses	2.50	500.00	JTP
Jul-16-21	Communicate/With Client Written discovery- received and reviewed email from [REDACTED]	0.10	20.00	JTP
Jul-20-21	Communicate/With Client Written discovery - received and reviewed email [REDACTED]	0.20	40.00	JTP
	Communicate/Other Outside Counsel Written discovery- wrote letter to plaintiff's counsel re: discovery	0.30	60.00	JTP
Jul-23-21	Receipt and Review of Analysis/Strategy - [REDACTED]	0.50	100.00	JTP
	Review/Analyze Document Production- received and reviewed plaintiff's second supplemental documents requests	0.10	20.00	JTP
Jul-28-21	Communicate/Other External Analysis/Strategy - telephone call [REDACTED]	0.50	100.00	JTP
	Communicate/With Client Document Production - wrote [REDACTED]	0.40	80.00	JTP
Jul-29-21	Communicate/Other External Analysis/Strategy- prepared email [REDACTED]	0.10	20.00	JTP

Totals	41.10	\$8,220.00
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FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
John T. Pruitt Jr	41.10	\$200.00	\$8,220.00

DISBURSEMENTS

		Disbursements	Receipts
Jun-09-21	Out-of-town travel 150 @ 0.56 - round trip mileage to Middlesboro for attendance at depositions and conference	84.00	
Jul-21-21	Deposition transcripts 1 @ 1023.00 - Southeastern Court Reporting - June 9, 2021 depositions of Jessica Case, Caleb Cooper and Anantha Singarajah	1,023.00	
	Totals	\$1,107.00	\$0.00

**Total Fees & Disbursements**

**\$9,327.00**

Previous Balance

\$1,560.00

Previous Payments

\$1,560.00

**Balance Due Now**

**\$9,327.00**

**Make Checks Payable to: Travis, Pruitt & Powers**



# INVOICE

Southeastern Court Reporting  
PO Box 863  
London, Kentucky 40741  
United States

606-864-5070

BILL TO  
**John T. Pruitt, Jr., Esq.**  
Travis Pruitt & Powers  
PO Drawer 30  
Somerset KY 42502-0030,

**PAID**  
7.21.2021

Invoice Number: 12908

Invoice Date: July 13, 2021

Payment Due: July 28, 2021

Amount Due (USD): \$1,023.00

Services	Amount
----------	--------

Date of Service June 9, 2021 Depositions of: Jesslca Case, Plaintiff Caleb Cooper Anantha Singarajah Original Transcripts as filed w/ the Clerk Transcript Copies Enclosed Appearance Fee Mini-Scripts & Indexing Postage & Handling	\$1,023.00
--	------------

Style of Case:  
Case vs. Water Service Corporation, et al

Location of Services:  
Via Zoom

Travis, Pruitt & Powers

42676

Southeastern Court Reporting Service LLC  
Billable Legal Expense JTP Case vs Water Service Corp

7/21/2021

1,023.00

PAYMENT  
RECORD

Cumberland Sec Gen Case vs. Water Service Corp Invoice 12908

1,023.00





\$12,605.75

Pay total: \$12,605.75

**Travis, Pruitt & Powers**  
207 East Mt Vernon Street  
PO Drawer 30  
Somerset, KY 42502-0030

Ph: 606.679.7345 Fax: 606.678.0411

Corix Group of Companies  
500 W. Monroe Street  
Suite 3600  
Chicago, IL 60661

Date: December 27, 2021  
Federal ID#: [REDACTED]

File #: [REDACTED]  
Inv #: 2476

Attention:

RE: Suite File#: F022020; Defendant: Water Service Corporation of Kentucky;  
Plaintiff: Jessica Marie Case; DOL: 05-01-2019; Venue: Bell Circuit Court,  
Kentucky

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Aug-03-21	Communicate/With Client Analysis/Strategy - telephone call [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Settlement/Non-binding ADR - wrote letter to co-defendant's counsel re: mediation/insurance representatives	0.40	80.00	JTP
Aug-04-21	Communicate/With Client Written discovery - received and reviewed email [REDACTED]	0.30	60.00	JTP
Aug-10-21	Review/Analyze Analysis/Strategy - received and reviewed email from client [REDACTED]	1.00	200.00	JTP
	Communicate/With Client Analysis/Strategy - prepared reply email to client [REDACTED]	0.10	20.00	JTP
Aug-11-21	Communicate/Other Outside Counsel Settlement/Non-binding ADR - received and reviewed email from counsel re: mediation	0.20	40.00	JTP
	Communicate/Other Outside Counsel Depositions - wrote letter to plaintiff's counsel re: depositions and documents requests	0.40	80.00	JTP
Aug-12-21	Communicate/Other External Analysis/Strategy - received call from [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Analysis/Strategy - received and reviewed email from client with	0.20	40.00	JTP

	[REDACTED]			
	Communicate/Other External Analysis/Strategy - telephone call to [REDACTED]	0.10	20.00	JTP
Aug-13-21	Communicate/Other External Analysis/Strategy - prepared email to [REDACTED]	0.20	40.00	JTP
Aug-17-21	Communicate/Other Outside Counsel Settlement/Non-binding ADR - prepared email to all counsel re: mediation schedule	0.30	60.00	JTP
	Communicate/With Client Settlement/Non-binding ADR - received and reviewed email from client and [REDACTED]	0.20	40.00	JTP
	Communicate/Other External Settlement/Non-binding ADR - prepared email to [REDACTED]	0.10	20.00	JTP
	Review/Analyze Document Production - reviewed documents requests production from company [REDACTED]	1.00	200.00	JTP
Aug-19-21	Communicate/Other Outside Counsel Settlement/Non-binding ADR - received and reviewed email from counsel re: confirm mediation	0.10	20.00	JTP
	Communicate/Other External Settlement/Non-binding ADR - prepared email to [REDACTED]	0.20	40.00	JTP
	Review/Analyze Document Production- received and reviewed email from client with [REDACTED]	3.00	600.00	JTP
Aug-20-21	Communicate/Other External Settlement/Non-binding ADR - prepared email to [REDACTED]	0.20	40.00	JTP
	Communicate/With Client Depositions - prepared email [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Depositions - received and reviewed email from [REDACTED]	0.20	40.00	JTP
	Communicate/Other Outside Counsel Depositions- received and reviewed email from counsel and sent reply email re: depositions	0.10	20.00	JTP

	Communicate/With Client Depositions - prepared email to [REDACTED]	0.20	40.00	JTP
Aug-23-21	Draft/revise Document Production - prepared revisions to documents requests responses to plaintiff's second supplemental requests	1.00	200.00	JTP
	Draft/revise Document Production- prepared revisions to documents requests responses and privilege log to plaintiff's first supplemental requests	2.00	400.00	JTP
	Appear for/Attend Depositions - attended Zoom meeting with [REDACTED]	0.50	100.00	JTP
	Communicate/Other Outside Counsel Depositions - prepared email to plaintiff's counsel re: deposition dates	0.20	40.00	JTP
	Communicate/With Client Depositions- prepared email to [REDACTED]	0.10	20.00	JTP
Aug-24-21	Communicate/With Client Analysis/Strategy - prepared email [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions- received and reviewed email from plaintiff's counsel and prepared reply email re: Killion deposition	0.20	40.00	JTP
	Communicate/With Client Depositions - received and reviewed email from client [REDACTED]	0.20	40.00	JTP
	Communicate/Other External Depositions - prepared email to [REDACTED]	0.30	60.00	JTP
	Communicate/Other External Depositions- received email from [REDACTED]	0.10	20.00	JTP
Aug-25-21	Communicate/With Client Depositions- received and reviewed email [REDACTED]	0.20	40.00	JTP
Aug-27-21	Review/Analyze Depositions- received and reviewed deposition notices and subpoenas of Mr. Killion, and Mr. Miller from counsel	0.10	20.00	JTP
	Communicate/With Client Depositions - prepared email to [REDACTED]	0.30	60.00	JTP



	Review/Analyze Depositions - received and reviewed email [REDACTED]	0.10	20.00	JTP
Aug-31-21	Communicate/With Client Written discovery-prepared email to [REDACTED]	0.10	20.00	JTP
Sep-01-21	Review/Analyze Settlement/Non-binding ADR - received and reviewed [REDACTED]	0.30	60.00	JTP
	Communicate/Other External Settlement/Non-binding ADR - conference with [REDACTED]	0.40	80.00	JTP
Sep-02-21	Communicate/Other Outside Counsel Analysis/Strategy - wrote letter to co-defendants' counsel re: med pay / insurer representatives	0.40	80.00	JTP
	Communicate/Other Outside Counsel Settlement/Non-binding ADR- wrote letter to plaintiff's counsel re: mediation, lens, photographs and demand	0.50	100.00	JTP
Sep-03-21	Review/Analyze Written discovery - final review and modifications to discovery responses to plaintiff's requests	0.50	100.00	JTP
Sep-07-21	Review/Analyze Depositions - received and reviewed [REDACTED]	3.00	600.00	JTP
Sep-08-21	Communicate/Other External Analysis/Strategy - received and reviewed [REDACTED]	1.00	200.00	JTP
	Review/Analyze Depositions - received and reviewed Zoom link re: depositions; and prepared email [REDACTED]	0.20	40.00	JTP
	Communicate/With Client Depositions - prepared email [REDACTED]	0.10	20.00	JTP
	Appear for/Attend Depositions - attended Zoom meeting [REDACTED]	0.50	100.00	JTP
Sep-09-21	Communicate/With Client Depositions - telephone call to [REDACTED]	0.10	20.00	JTP
	Appear for/Attend Depositions - attended deposition of Jeffrey Killion and Mike Miller (via Zoom)	2.00	400.00	JTP

Sep-15-21	Communicate/Other Outside Counsel Analysis/Strategy - prepared email to [REDACTED] [REDACTED]	0.20	40.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - prepared email [REDACTED] [REDACTED]	0.10	20.00	JTP
	Communicate/Other External Depositions - wrote letter [REDACTED] [REDACTED]	1.50	300.00	JTP
Sep-16-21	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed co-defendant Middlesboro counsel's email and sent reply email re: insurer representative	0.20	40.00	JTP
	Communicate/Other External Analysis/Strategy- wrote letter [REDACTED] [REDACTED]	3.00	600.00	JTP
Sep-20-21	Communicate/Other Outside Counsel Analysis/Strategy- received and reviewed email from counsel for Wilder Construction [REDACTED] [REDACTED]	0.20	40.00	JTP
Sep-21-21	Communicate/Other External Analysis/Strategy- received and reviewed email from [REDACTED] [REDACTED]	0.20	40.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy- prepared email to [REDACTED] [REDACTED]	0.40	80.00	JTP
Sep-23-21	Review/Analyze Analysis/Strategy - revised letter [REDACTED]	0.30	60.00	JTP
Sep-30-21	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed letter from plaintiff's counsel with discs (medicals, etc.)	0.20	40.00	JTP
	Research Analysis/Strategy - [REDACTED] [REDACTED]	2.00	400.00	JTP
	Communicate/With Client Analysis/Strategy- prepared email to [REDACTED] [REDACTED]	0.20	40.00	JTP
Oct-01-21	Communicate/With Client Analysis/Strategy - received and reviewed email [REDACTED] [REDACTED]	0.10	20.00	JTP
	Communicate/Other External Analysis/Strategy- prepared email to [REDACTED] [REDACTED]	0.10	20.00	JTP

	Communicate/Other External Analysis/Strategy - wrote letter [REDACTED]	0.30	60.00	JTP
Oct-06-21	Communicate/Other External Analysis/Strategy - wrote letter [REDACTED]	1.00	200.00	JTP
Oct-07-21	Review/Analyze Analysis/Strategy- received and reviewed additional materials concerning plaintiff's injuries from plaintiff's counsel (via discs)	3.50	700.00	JTP
Oct-08-21	Communicate/Other External Analysis/Strategy - wrote letter to [REDACTED]	1.00	200.00	JTP
Oct-18-21	Communicate/Other External Analysis/Strategy- received and reviewed email [REDACTED]	0.10	20.00	JTP
Oct-19-21	Communicate/With Client Analysis/Strategy- received and reviewed email from [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Analysis/Strategy - received and reviewed email from [REDACTED]	0.10	20.00	JTP
Oct-20-21	Communicate/With Client Analysis/Strategy - received and reviewed email from [REDACTED]	0.10	20.00	JTP
	Communicate/Other External Analysis/Strategy - received and reviewed email from [REDACTED]	0.10	20.00	JTP
Oct-22-21	Communicate/Other External Analysis/Strategy- received and reviewed email [REDACTED]	0.10	20.00	JTP
Oct-29-21	Review/Analyze Analysis/Strategy - received and reviewed email from [REDACTED]	0.10	20.00	JTP
Nov-03-21	Communicate/Other Outside Counsel Analysis/Strategy - prepared email to [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed email from [REDACTED]	0.10	20.00	JTP
Nov-04-21	Communicate/Other External Analysis/Strategy - prepared email [REDACTED]	0.10	20.00	JTP

	Communicate/Other External Analysis/Strategy - received and reviewed email [REDACTED]	0.10	20.00	JTP
Nov-05-21	Communicate/Other Outside Counsel Analysis/Strategy - prepared email to [REDACTED]	0.10	20.00	JTP
	Communicate/Other External Analysis/Strategy - received and reviewed email from [REDACTED]	0.10	20.00	JTP
Nov-09-21	Communicate/Other Outside Counsel Analysis/Strategy - received call from Atty. Ray Jones re: claim	0.10	20.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - telephone call to Atty. Ray Jones re: claim	0.50	100.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy- telephonic conference with [REDACTED]	0.50	100.00	JTP
	Communicate/Other External Analysis/Strategy- telephonic conference with [REDACTED]	0.40	80.00	JTP
Nov-12-21	Review/Analyze Analysis/Strategy- received and reviewed plaintiff's transcript from Lincoln Memorial University	0.30	60.00	JTP
	Communicate/Other External Analysis/Strategy - wrote letter to [REDACTED]	0.30	60.00	JTP
	Communicate/Other External Settlement/Non-binding ADR- received and reviewed email from [REDACTED]	0.10	20.00	JTP
Nov-18-21	Draft/revise Settlement/Non-binding ADR - prepared mediation statement to mediator	2.50	500.00	JTP
	Communicate/Other External Settlement/Non-binding [REDACTED] R - wrote letter to [REDACTED]	0.50	100.00	JTP
Nov-19-21	Communicate/With Client Written discovery - wrote letter [REDACTED]	0.20	40.00	JTP
Nov-22-21	Communicate/With Client Settlement/Non-binding	0.30	60.00	JTP

	ADR- received and reviewed email [REDACTED]			
	Communicate/With Client Written discovery - received and reviewed email from [REDACTED]	0.20	40.00	JTP
Nov-23-21	Review/Analyze Analysis/Strategy - received and reviewed [REDACTED]	0.50	100.00	JTP
	Appear for/Attend Settlement/Non-binding ADR - attended mediation of claim (via Zoom)	2.50	500.00	JTP
Nov-30-21	Review/Analyze Experts/Consultants - received and reviewed email from Atty. Wicker with plaintiff's engineering expert report (reviewed)	0.50	100.00	JTP
	Communicate/Other External Settlement/Non-binding ADR- received and reviewed letter from Atty. Linda Hopgood re: mediation outcome	0.10	20.00	JTP
Dec-01-21	Communicate/Other External Experts/Consultants - prepared email to [REDACTED]	0.20	40.00	JTP
Dec-07-21	Review/Analyze Analysis/Strategy- received and reviewed email from plaintiff's counsel; and received telephone call from plaintiff's counsel re: expert, discovery and deposition of plaintiff's father; reviewed letter from plaintiff's counsel re: experts/trial; and reviewed email [REDACTED]	2.50	500.00	JTP
Dec-13-21	Communicate/Other External Analysis/Strategy - prepared email to [REDACTED]	0.30	60.00	JTP
	Draft/revise Written discovery - prepared answers/responses to plaintiff's first supplemental interrogatories and documents requests	0.50	100.00	JTP
	Communicate/With Client Written discovery- prepared email to [REDACTED]	0.10	20.00	JTP
Dec-14-21	Communicate/Other Outside Counsel Analysis/Strategy - prepared email to [REDACTED] re: [REDACTED]	0.20	40.00	JTP
	Communicate/Other External Analysis/Strategy -	0.20	40.00	JTP



	[REDACTED]			
	Review/Analyze Depositions - received and reviewed Stephen Vaughn's deposition; reviewed email [REDACTED]	2.00	400.00	JTP
Dec-15-21	Communicate/Other External Analysis/Strategy - received and reviewed email from [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - telephone call to [REDACTED]	0.50	100.00	JTP
Dec-17-21	Review/Analyze Depositions- received and reviewed deposition notice of IME doctor from counsel	0.10	20.00	JTP
Dec-20-21	Communicate/Other Outside Counsel Analysis/Strategy - received call [REDACTED]	0.30	60.00	JTP
Dec-21-21	Communicate/Other External Analysis/Strategy- received and reviewed email from [REDACTED]	0.30	60.00	JTP
	Communicate/Other External Analysis/Strategy- received call from [REDACTED]	0.40	80.00	JTP
	Communicate/Other External Analysis/Strategy- received and reviewed email from [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy- wrote letter to [REDACTED]	0.50	100.00	JTP
	Communicate/Other External Experts/Consultants - telephone call to [REDACTED]		20.00	JTP
Dec-22-21	Communicate/Other External Analysis/Strategy - received and reviewed email [REDACTED]	0.20	40.00	JTP
	Communicate/With Client Analysis/Strategy- prepared email to [REDACTED]	0.20	40.00	JTP
Dec-27-21	Communicate/Other External Analysis/Strategy - prepared email to [REDACTED]	0.50	100.00	JTP
	Review/Analyze Analysis/Strategy- received and	1.00	200.00	JTP



Review/Analyze Analysis/Strategy - received and reviewed	1.00	200.00	JTP
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Totals	59.90	\$11,980.00	
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FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
John T. Pruitt Jr	59.90	\$200.00	\$11,980.00

DISBURSEMENTS

		Disbursements	Receipts
Sep-17-21	Deposition transcripts 1 @ 275.75 - Osborne Reporting & Video - depositions of Stephen Vaughn, Tim Kelley, Michael Wilder and Rick Nelson	275.75	
Nov-23-21	Arbitrators/Mediators 1 @ 350.00 - November 29, 2021 Mediation - Linda Hopgood Mediator	350.00	
Totals		\$625.75	\$0.00

<b>Total Fees &amp; Disbursements</b>	<b>\$12,605.75</b>
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Previous Balance	\$9,327.00
Previous Payments	\$9,327.00

<b>Balance Due Now</b>	<b>\$12,605.75</b>
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**Make Checks Payable to: Travis, Pruitt & Powers**

OSBORNE REPORTING & VIDEO SVC., LLC  
61 AJAX DRIVE  
PIKEVILLE, KY 41501  
(606) 432-2890  
pam@osbamereporting.com

**Invoice**

Number	1250
Date	9/7/2021

**BILL TO**  
TRAVIS, PRUITT AND POWERS  
P.O. DRAWER 30  
SOMERSET, KY, 42502

FEDERAL ID NUMBER 61-1174086

**PAID**  
9-17-2021

CASE STYLE AND NUMBER	Amount
CASE v MIDDLESBORO, ET AL 230-01-034-BELL	
DEPOSITION OF STEPHEN VAUGHN (COPY), 5 PP.	
EXHIBITS, 5 PP.	\$1.25
DEPOSITION OF MICHAEL WILDER (COPY), 9 PP.	\$20.25
DEPOSITION OF MICHAEL WILDER (COPY), 9 PP.	\$20.25
EXHIBITS, 81 PP.	\$20.25

Travis, Pruitt & Powers

Osborne Reporting & Video LLC  
Billable Legal Expense JTP



9/17/2021

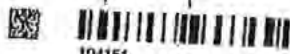
42745

275.75

**PAYMENT  
RECORD**

Cumberland Sec Gen. Invoice 1250

275.75





\$8,815

**Travis, Pruitt & Powers**  
207 East Mt Vernon Street  
PO Drawer 30  
Somerset, KY 42502-0030

Ph: 606.679.7345

Fax: 606.678.0411

Corlx Group of Companies  
500 W. Monroe Street  
Suite 3600  
Chicago, IL 60661

Date: March 15, 2022  
Federal ID#: [REDACTED]

R71-2210-100330

File #: [REDACTED]  
Inv #: 2542

Attention:

RE: Suite File#: F022020; Defendant: Water Service Corporation of Kentucky;  
Plaintiff: Jessica Marie Case; DOL: 05-01-2019; Venue: Bell Circuit Court,  
Kentucky

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Dec-29-21	Communicate/With Client Written discovery - received and reviewed email from [REDACTED]	0.10	20.00	JTP
	Communicate/Other External Depositions- prepared email to [REDACTED]	0.20	40.00	JTP
Jan-03-22	Communicate/Other Outside Counsel Analysis/Strategy - wrote letter to plaintiff's counsel re: school records	0.30	60.00	JTP
	Research Analysis/Strategy - researched law on [REDACTED]	3.00	600.00	JTP
	Communicate/Other External Experts/Consultants- telephone call to [REDACTED]	0.10	20.00	JTP
	Review/Analyze Dispositive Motions - received and reviewed co-defendant's motion for summary judgment and memorandum in support	0.50	100.00	JTP
	Communicate/With Client Dispositive Motions - prepared email to [REDACTED]	0.20	40.00	JTP
	Communicate/Other Outside Counsel Depositions - received and reviewed email from counsel and sent reply email re: deposition / Zoom option	0.20	40.00	JTP
Jan-04-22	Draft/revise Dispositive Motlons - prepared	4.00	800.00	JTP

	response to Middlesboro's motion for summary judgment			
	Communicate/Other Outside Counsel Depositions - received call from Atty. Ray Jones re: Dr. Gill deposition	0.10	20.00	JTP
Jan-05-22	Communicate/Other Outside Counsel Analysis/Strategy - prepared email to Atty. Ray Jones re: authorization for school records	0.10	20.00	JTP
	Communicate/With Client Analysis/Strategy - received and [REDACTED]	0.10	20.00	JTP
	Prepared Analysis/Strategy - prepared email to [REDACTED]	0.50	100.00	JTP
	Communicate/With Client Analysis/Strategy- telephone call to [REDACTED]	0.50	100.00	JTP
	Communicate/With Client Analysis/Strategy - prepared email to [REDACTED]	0.20	40.00	JTP
	Communicate/Other External Analysis/Strategy- received and reviewed email [REDACTED]	0.10	20.00	JTP
	Communicate/Other External Experts/Consultants - prepared email to [REDACTED]	0.30	60.00	JTP
	Draft/revise Pleadings - prepared revised response and affidavit re: motion for summary judgment	0.50	100.00	JTP
	Communicate/With Client Dispositive Motions - prepared email to [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions - prepared email to Atty. Ray Jones re: deposition of Mr. Grundy and Mr. Case	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions- prepared email to plaintiff's counsel re: Case deposition	0.10	20.00	JTP
Jan-06-22	Communicate/With Client Analysis/Strategy- prepared email to [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed email from Atty. Jones re: authorization	0.10	20.00	JTP
	Draft/revise Analysis/Strategy- prepared summary report to [REDACTED]	1.00	200.00	JTP

	Communicate/Other External Experts/Consultants - telephone call to [REDACTED]	0.10	20.00	JTP
	Communicate/Other External Experts/Consultants- received call from [REDACTED]	0.30	60.00	JTP
	Communicate/Other External Experts/Consultants- telephone call to [REDACTED]	0.20	40.00	JTP
Jan-10-22	Communicate/Other External Experts/Consultants - telephone call to [REDACTED]	0.20	40.00	JTP
Jan-11-22	Research Analysis/Strategy - researched law on multiple depositions of one deponent	2.00	400.00	JTP
Jan-12-22	Communicate/Other External Experts/Consultants- telephone call to [REDACTED]	0.10	20.00	JTP
	Communicate/Other External Experts/Consultants - prepared email to [REDACTED]	0.20	40.00	JTP
	Communicate/Other External Experts/Consultants - received and reviewed reply email [REDACTED]	0.30	60.00	JTP
Jan-13-22	Communicate/Other External Experts/Consultants - telephone call to [REDACTED]	0.50	100.00	JTP
	Communicate/Other External Experts/Consultants - prepared email to [REDACTED]	0.30	60.00	JTP
	Review/Analyze Written discovery - received and reviewed plaintiff's third supplemental request for documents	0.10	20.00	JTP
	Communicate/With Client: Written discovery - wrote letter to [REDACTED]	0.30	60.00	JTP
	Review/Analyze Depositions - reviewed deposition transcripts of Mr. Killum and Mr. Miller	2.00	400.00	JTP
Jan-17-22	Research Analysis/Strategy - researched law - [REDACTED]	1.00	200.00	JTP
Jan-18-22	Review/Analyze Other Written Motions/Submissions- received and reviewed plaintiff's motion to compel insurance company name	0.30	60.00	JTP
	Review/Analyze Written discovery- received and reviewed fourth supplemental request for documents from plaintiff	0.20	40.00	JTP
	Review/Analyze Depositions- received and reviewed notice of cancellation of Dr. Gill	0.20	40.00	JTP

	deposition, Dr. Ellingson deposition and Laura Lampton deposition			
Jan-19-22	Review/Analyze Analysis/Strategy - reviewed email and policy [REDACTED]	0.50	100.00	JTP
	Communicate/Other External Analysis/Strategy - received and reviewed email from [REDACTED]	0.10	20.00	JTP
	Review/Analyze Analysis/Strategy- reviewed [REDACTED]	1.00	200.00	JTP
	Communicate/Other External Analysis/Strategy - received and reviewed email and sent reply email [REDACTED]	0.20	40.00	JTP
	Draft/revise Pleadings - prepared response to motion to compel	0.50	100.00	JTP
	Communicate/With Client Written discovery - prepared email [REDACTED]	0.10	20.00	JTP
Jan-20-22	Plan and prepare for Depositions - reviewed medical records of Dr. Wallace in preparation of deposition	2.00	400.00	JTP
Jan-24-22	Communicate/With Client Document Production - prepared email to S [REDACTED]	0.20	40.00	JTP
Jan-25-22	Communicate/With Client Document Production - received and reviewed email [REDACTED]	0.20	40.00	JTP
	Communicate/With Client Document Production- received and reviewed email [REDACTED]	0.10	20.00	JTP
Feb-01-22	Communicate/Other External Experts/Consultants - prepared email [REDACTED]	0.10	20.00	JTP
Feb-03-22	Communicate/Other Outside Counsel Analysis/Strategy - telephone call to [REDACTED]	0.10	20.00	JTP
	Review/Analyze Analysis/Strategy - received call from [REDACTED]	0.70	140.00	JTP
	Review/Analyze Dispositive Motions - received and	0.50	100.00	JTP

	reviewed co-defendant Wilder's motion for summary judgment and memo			
Feb-07-22	Review/Analyze Analysis/Strategy - received and reviewed email from [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - wrote letter to [REDACTED]	0.50	100.00	JTP
Feb-08-22	Communicate/Other Outside Counsel Dispositive Motions- received and reviewed email from [REDACTED]	0.30	60.00	JTP
	Communicate/Other External Depositions - received and reviewed email from [REDACTED]	0.20	40.00	JTP
Feb-09-22	Review/Analyze Analysis/Strategy- reviewed [REDACTED]	0.30	60.00	JTP
	Communicate/Other External Analysis/Strategy- telephone call to [REDACTED]	0.10	20.00	JTP
	Review/Analyze Depositions - received and reviewed Zoom link for depositions; prepared email to [REDACTED]	0.30	60.00	JTP
	Plan and prepare for Depositions - prepared for Zoom deposition of Mr. Grundy and Mr. Case	1.00	200.00	JTP
	Appear for/Attend Depositions - attended Zoom deposition of John Grundy and Mr. Case	2.50	500.00	JTP
Feb-10-22	Review/Analyze Analysis/Strategy- received and reviewed email a [REDACTED]	0.20	40.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed copy of letter to plaintiff's counsel from co-defendant re: medicals	0.10	20.00	JTP
	Communicate/Other External Analysis/Strategy - received and reviewed email re: confirm Court hearing / Zoom link	0.20	40.00	JTP
	Draft/revise Depositions - prepared deposition summary of [REDACTED]	1.50	300.00	JTP
Feb-11-22	Communicate/With Client Pleadings- [REDACTED] email to [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Written discovery - telephone call [REDACTED]	0.10	20.00	JTP



Feb-14-22	Appear for/Attend Other Written Motions/Submissions - Court appearance for motions (via Zoom)	1.00	200.00	JTP
	Communicate/Other External Other Written Motions/Submissions- prepared email to clients re: [REDACTED]	0.10	20.00	JTP
Feb-16-22	Review/Analyze Analysis/Strategy- reviewed [REDACTED]	1.00	200.00	JTP
	Appear for/Attend Analysis/Strategy - attended team meetings video conference re: [REDACTED]	0.30	60.00	JTP
	Review/Analyze Analysis/Strategy - reviewed documents re: [REDACTED]	0.50	100.00	JTP
Feb-17-22	Review/Analyze Analysis/Strategy- received and reviewed [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Written discovery - prepared email [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Written discovery - received and reviewed email from [REDACTED]	0.10	20.00	JTP
Feb-18-22	Review/Analyze Analysis/Strategy- reviewed detailed budget records [REDACTED]	0.50	100.00	JTP
	Review/Analyze Pleadings- received and reviewed proposed order resetting trial and briefs for motion for summary judgment	0.20	40.00	JTP
	Draft/revise Written discovery - prepared draft of responses to plaintiff's 4th request for production of documents	1.00	200.00	JTP
	Communicate/With Client Written discovery - prepared email to [REDACTED]	0.10	20.00	JTP
Feb-21-22	Communicate/Other External Analysis/Strategy- received [REDACTED]	0.10	20.00	JTP
	Communicate/Other Outside Counsel Depositions- received and reviewed email from plaintiff's counsel and sent reply email re: deposition	0.10	20.00	JTP
Feb-22-22	Communicate/With Client Depositions - telephone call to [REDACTED]	0.50	100.00	JTP
	Communicate/Other Outside Counsel	0.10	20.00	JTP

	Depositions - prepared email to plaintiff's counsel re: deposition of Stephen Vaughn			
	Communicate/Other Outside Counsel Depositions - received and reviewed email from plaintiff's counsel re: deposition of Stephen Vaughn	0.10	20.00	JTP
Feb-23-22	Communicate/With Client Depositions- received and reviewed email from Stephen Vaughn and sent reply email re: deposition preparation	0.20	40.00	JTP
	Communicate/With Client Depositions - received and reviewed email [REDACTED]	0.10	20.00	JTP
Feb-24-22	Communicate/With Client Analysis/Strategy - received and reviewed email [REDACTED]	0.10	20.00	JTP
	Communicate/With Client Written discovery - received and reviewed [REDACTED]	0.10	20.00	JTP
Feb-25-22	Review/Analyze Analysis/Strategy- received and reviewed medical records from co-defendant, City of Middlesboro, of plaintiff	2.00	400.00	JTP
	Communicate/With Client Written discovery- prepared email to [REDACTED]	0.10	20.00	JTP
	Totals	43.10	\$8,620.00	

FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
John T. Pruitt Jr	43.10	\$200.00	\$8,620.00

DISBURSEMENTS

		Disbursements	Receipts
Feb-11-22	Experts 1 @ 195.00 - Kentucky Claim Solutions, LLC - [REDACTED]	195.00	
	Totals	\$195.00	\$0.00

<b>Total Fees &amp; Disbursements</b>	<b>\$8,815.00</b>
Previous Balance	\$12,605.75
Previous Payments	\$12,605.75
<b>Balance Due Now</b>	<b>\$8,815.00</b>

**Make Checks Payable to: Travis, Pruitt & Powers**



\$9,608.44

**Travis, Pruitt & Powers**  
207 East Mt Vernon Street  
PO Drawer 30  
Somerset, KY 42502-0030

Ph: 606.679.7345

Fax: 606.678.0411

Corix Group of Companies  
500 W. Monroe Street  
Suite 3600  
Chicago, IL 60661

Date: June 15, 2022

Federal ID#: [REDACTED]

Attention:

R71-2210-100330

File #: [REDACTED]

Inv #: 2598

RE: Suite File#: F022020; Defendant: Water Service Corporation of Kentucky;  
Plaintiff: Jessica Marie Case; DOL: 05-01-2019; Venue: Bell Circuit Court,  
Kentucky

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Mar-02-22	Communicate/Other Outside Counsel Analysis/Strategy - prepared email [REDACTED] [REDACTED]	0.50	100.00	JTP
	Review/Analyze Pleadings- received and reviewed notice of second deposition of Stephen Vaughn	0.10	20.00	JTP
Mar-04-22	Communicate/With Client Depositions- telephone call to [REDACTED] [REDACTED]	1.00	200.00	JTP
Mar-09-22	Appear for/Attend Depositions - attended second deposition of Stephen Vaughn (via Zoom)	1.00	200.00	JTP
Mar-11-22	Communicate/Other External Depositions- prepared email to Court Reporter re: Stephen Vaughn deposition signing	0.10	20.00	JTP
	Research Depositions - [REDACTED] [REDACTED]	0.50	100.00	JTP
Mar-15-22	Review/Analyze Analysis/Strategy- received and reviewed email from [REDACTED] [REDACTED]	1.00	200.00	JTP
Mar-16-22	Communicate/Other External Analysis/Strategy - prepared email to [REDACTED] [REDACTED]	0.10	20.00	JTP
Mar-21-22	Communicate/Other Outside Counsel Settlement/Non-binding ADR - received and	0.10	20.00	JTP

	reviewed email from co-defendant's counsel re: mediation			
	Communicate/Other Outside Counsel Settlement/Non-binding ADR- prepared email to counsel re: possible mediation dates	0.10	20.00	JTP
	Communicate/Other Outside Counsel Settlement/Non-binding ADR - received and reviewed email from counsel and sent reply email re: new mediation date	0.10	20.00	JTP
	Draft/revise Depositions - prepared [REDACTED]	0.50	100.00	JTP
Mar-22-22	Review/Analyze Settlement/Non-binding ADR - [REDACTED]	0.20	40.00	JTP
Mar-23-22	Communicate/With Client Settlement/Non-binding ADR - wrote letter to client re: new mediation date	0.30	60.00	JTP
Mar-24-22	Communicate/Other External Settlement/Non-binding ADR - prepared email to mediator Linda Hopgood with executed mediation and escrow agreement cc: all counsel	0.20	40.00	JTP
Mar-25-22	Review/Analyze Analysis/Strategy- received and [REDACTED]	1.00	200.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy - prepared email to [REDACTED]	0.20	40.00	JTP
Apr-08-22	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed letter [REDACTED]	0.20	40.00	JTP
Apr-15-22	Communicate/Other External Written discovery prepared email [REDACTED]	0.20	40.00	JTP
Apr-19-22	Communicate/Other External Experts/Consultants- telephone call to [REDACTED]	0.10	20.00	JTP
Apr-25-22	Review/Analyze Other Written Motions/Submissions- received and reviewed co-defendant's motion	1.00	200.00	JTP
Apr-26-22	Review/Analyze Written discovery - received and reviewed plaintiff's supplemental discovery responses	0.50	100.00	JTP
	Review/Analyze Written discovery- received and [REDACTED]	1.50	300.00	JTP

	reviewed medical records disc from plaintiff re: supplemental responses			
Apr-27-22	Communicate/Other External Experts/Consultants- prepared email to [REDACTED]	0.20	40.00	JTP
	Review/Analyze Experts/Consultants - received and reviewed [REDACTED]	0.30	60.00	JTP
	Draft/revise Dispositive Motions - prepared response to City of Middlesboro's motion for summary judgment - reviewed [REDACTED]	6.00	1,200.00	JTP
Apr-28-22	Research Analysis/Strategy - researched law on [REDACTED]	2.00	400.00	JTP
	Draft/revise Pleadings - begin preparation of response to City of Middlesboro's motion for summary judgment	1.00	200.00	JTP
Apr-29-22	Review/Analyze Analysis/Strategy - reviewed [REDACTED]	0.30	60.00	JTP
	Review/Analyze Analysis/Strategy- reviewed [REDACTED]	0.40	80.00	JTP
	Communicate/Other External Experts/Consultants- received call [REDACTED]	0.40	80.00	JTP
May-03-22	Communicate/With Client Dispositive Motlons- prepared email to client [REDACTED]	0.30	60.00	JTP
	Communicate/With Client Depositions - received call from [REDACTED]	0.20	40.00	JTP
May-04-22	Communicate/Other Outside Counsel Analysis/Strategy- received and reviewed email letter from [REDACTED]	0.20	40.00	JTP
	Draft/revise Dispositive Motions - completed response to defendant, City of Middlesboro's, motion for summary judgment	2.00	400.00	JTP
	Communicate/With Client Depositions- prepared email [REDACTED]	0.10	20.00	JTP
May-05-22	Draft/revise Dispositive Motions - prepared revisions to response to City's motion for summary judgment	1.50	300.00	JTP

May-06-22	Review/Analyze Dispositive Motions - prepared final revisions to response to City's motion for summary judgment; and reviewed Wilder's motion for summary judgment re: [REDACTED] [REDACTED]	2.00	400.00	JTP
May-09-22	Communicate/Other Outside Counsel Analysis/Strategy- received and reviewed email from [REDACTED]	0.20	40.00	JTP
	Review/Analyze Pleadings- received and reviewed Wilder's proposed Summary Judgment Order	0.10	20.00	JTP
	Plan and prepare for Dispositive Motions - prepared for hearing of City and Wilder's motions for summary judgment	1.00	200.00	JTP
	Appear for/Attend Other Written Motions/Submissions - Court appearance on City and Wilder's motions for summary judgment hearing	1.00	200.00	JTP
	Communicate/With Client Other Written Motions/Submissions - wrote letter [REDACTED] [REDACTED]	0.70	140.00	JTP
May-10-22	Communicate/Other Outside Counsel Analysis/Strategy - prepared email [REDACTED] [REDACTED]	0.20	40.00	JTP
	Communicate/With Client Analysis/Strategy- prepared email [REDACTED] [REDACTED]	0.10	20.00	JTP
	Review/Analyze Analysis/Strategy - received and reviewed [REDACTED]	1.00	200.00	JTP
	Review/Analyze Pleadings- received and reviewed City's proposed Summary Judgment Order	0.10	20.00	JTP
	Communicate/Other Outside Counsel Dispositive Motions - received and reviewed email from [REDACTED] [REDACTED]	0.30	60.00	JTP
	Draft/revise Document Production- prepared revisions to responses to plaintiff's 4th requests for production of documents	1.00	200.00	JTP
May-11-22	Communicate/With Client Analysis/Strategy - prepared email [REDACTED] [REDACTED]	0.10	20.00	JTP
	Review/Analyze Experts/Consultants- reviewed file for [REDACTED] [REDACTED]	1.00	200.00	JTP

	Communicate/Other External Experts/Consultants- wrote letter [REDACTED]	0.30	60.00	JTP
	Draft/revise Written discovery- prepared supplemental Interrogatories and document requests to plaintiff	1.00	200.00	JTP
May-12-22	Communicate/Other External Analysis/Strategy - wrote letter to [REDACTED]	0.40	80.00	JTP
	Review/Analyze Dispositive Motlons - begin preparation of draft of motion for summary judgment - [REDACTED]	0.50	100.00	JTP
May-19-22	Draft/revise Dispositive Motions - continued preparation of motion for summary judgment and memorandum in support	1.00	200.00	JTP
May-23-22	Communicate/Other Outside Counsel Analysis/Strategy - received and reviewed letter from [REDACTED]	0.10	20.00	JTP
	Review/Analyze Analysis/Strategy- received and reviewed email [REDACTED]	0.20	40.00	JTP
	Review/Analyze Pleadings- received and reviewed City's summary judgment order as entered	0.10	20.00	JTP
	Draft/revise Dispositive Motions- completed preparation of motion for summary judgment and memorandum in support	1.00	200.00	JTP
May-26-22	Review/Analyze Analysis/Strategy- received and reviewed email from [REDACTED] re: [REDACTED]	0.20	40.00	JTP
May-31-22	Communicate/Other Outside Counsel Analysis/Strategy - prepared email to Atty. Ray Jones with letter and enclosures re: medical records	0.10	20.00	JTP
	Communicate/Other Outside Counsel Analysis/Strategy- wrote letter to plaintiff's counsel re: plaintiff foot doctor records for IME doctor	0.30	60.00	JTP
	Review/Analyze Pleadings- received and reviewed defendant Wilder's summary judgment order as entered	0.10	20.00	JTP

Totals	39.50	\$7,900.00
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FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
John T. Pruitt Jr	39.50	\$200.00	\$7,900.00

DISBURSEMENTS

		Disbursements	Receipts
Apr-15-22	Experts Tooms, Dunaway & Webster - 1/2 IME expense with Dr. Shaver and 1/2 travel expense of plaintiff to IME 1 @ 708.44	708.44	
May-06-22	Experts 1 @ 1000.00 - [REDACTED]	1,000.00	
Totals		\$1,708.44	\$0.00

<b>Total Fees &amp; Disbursements</b>	<b>\$9,608.44</b>
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Previous Balance	\$8,815.00
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Previous Payments	\$0.00
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<b>Balance Due Now</b>	<b>\$18,423.44</b>
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**Make Checks Payable to: Travis, Pruitt & Powers**



# STURGILL TURNER

\$1,224

Sturgill, Turner, Barker & Moloney, PLLC  
333 West Vine Street, Suite 1500  
Lexington, KY 40507  
p: 859.255.8581 f: 859.231.0851  
www.sturgillturner.com

Employer I.D. No. [REDACTED]

## INVOICE OF SERVICES

Invoice Date: 09/09/2021  
Invoice No: 151497  
Account No: [REDACTED]  
PO# P91-2210-100169

Allen Wilt  
Utilities, Inc.  
500 W. Monroe  
Suite 3600  
Chicago, IL 60661-3779

[REDACTED]

Date	Timekeeper	Rate	Task Code	Description	Hours	Rate	Total
08/09/2021	MTO	L120	A106	Communicate (with client) with [REDACTED]	1.70		
08/16/2021	MTO	L120	A106	Communicate (with client) - phone call with Seth Whitney [REDACTED]	0.80		
08/26/2021	MTO	L120	A104	Review legal requirements [REDACTED]	2.30		
For Current Services Rendered					4.80		1,224.00

### Recapitulation

Timekeeper	Title	Hours	Hourly Rate	Total
M. Todd Osterloh	Member	4.80	\$255.00	\$1,224.00
Total Current Work				1,224.00
Balance Due				<u>\$1,224.00</u>

### Task Code Summary

Task Code	Description	Fees	Expenses
L120	Analysis/Strategy	1,224.00	0.00
L100	Do not Use-See L110-L190 Case Assessment, Development & Admin	1,224.00	0.00

**PAYMENT DUE UPON RECEIPT**  
To ensure proper credit to your account  
Please write [REDACTED] on your check  
Thank you

# STURGILL TURNER

\$382.50

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333 West Vine Street, Suite 1500  
Lexington, KY 40507  
p: 859.255.8581 f: 859.231.0851  
www.sturgillturner.com

Employer I.D. No [REDACTED]

Allen Wilt  
Utilities, Inc.  
500 W. Monroe  
Suite 3600  
Chicago, IL 60661-3779

## INVOICE OF SERVICES

Invoice Date: 11/02/2021  
Invoice No: 152709  
Account No: [REDACTED]  
PO# P91-2210-100169

[REDACTED]

Date	Code	Code	Code	Description	Hours		
10/06/2021	MTO	C300	A106	Communicate (with client) phone call with S. Whitney [REDACTED]	0.20		
10/07/2021	MTO	L120	A103	Draft/revise email to AG's office regarding local public meetings	0.20		
	MTO	L120	A103	Draft/revise meeting request form and email PSC Staff regarding same.	0.40		
10/21/2021	MTO	C300	A104	Review and respond to email from S. Whitney [REDACTED]; communicate with PSC Staff regarding meeting.	0.40		
10/22/2021	MTO	C300	A106	Communicate (with client) - follow up with S. Whitney [REDACTED]	0.10		
10/27/2021	MTO	C300	A106	Communicate (with client) - draft email to S. Whitney regarding [REDACTED]	0.20		
				For Current Services Rendered	1.50		382.50

### Recapitulation

Timekeeper	Title	Hours	Hourly Rate	Total
M. Todd Osterloh	Member	1.50	\$255.00	\$382.50
	Total Current Work			382.50
	Previous Balance			\$1,395.50
	Balance Due			<u>\$1,778.00</u>

### Task Code Summary

Code	Description	Fees	Expenses
C300	Analysis and Advice	229.50	0.00
C300	Analysis and Advice	229.50	0.00



Utilities, Inc.  
[REDACTED]

Account No. [REDACTED]  
Invoice No. 152709

		<u>Fees</u>	<u>Expenses</u>
L120	Analysis/Strategy	153.00	0.00
L100	Do not Use-See L110-L190 Case Assessment,Development &Admin	153.00	0.00

PAYMENT DUE UPON RECEIPT  
To ensure proper credit to your account  
Please write Account [REDACTED] on your check  
Thank you

\$382.50

# STURGILL TURNER

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333 West Vine Street, Suite 1500  
Lexington, KY 40507  
p: 859.255.8581 f: 859.231.0851  
www.sturgillturner.com

Allen Wilt  
Utilities, Inc.  
500 W. Monroe  
Suite 3600  
Chicago, IL 60661-3779

## INVOICE OF SERVICES

Invoice Date: 01/04/2022  
Invoice No: 154371  
Account No: [REDACTED]  
PO# P91-2210-100169

[REDACTED]

Date	Client	Project	Task	Description	Hours	
12/08/2021	MTO	C300	A108	Communicate (other external) with PSC Staff regarding biennial meeting with the Commissioners.	0.20	
	MTO	C300	A106	Communicate (with client) with S. Whitney regarding [REDACTED]	0.10	
12/09/2021	MTO	L120	A104	Review email from PSC Staff; draft email to S. Whitney regarding [REDACTED]	0.20	
12/13/2021	MTO	L120	A106	Communicate (with client) with litigation counsel J. Pruitt [REDACTED]	0.50	
12/14/2021	MTO	L120	A106	Communicate (with client) with S. Whitney and PSC Staff about rescheduling meeting [REDACTED]	0.20	
12/27/2021	MTO	L120	A106	Communicate (with client) - phone call with S. Whitney regarding [REDACTED]	0.30	
				For Current Services Rendered	1.50	382.50

### Recapitulation

Timekeeper	Title	Hours	Hourly Rate	Total
M. Todd Osterloh	Member	1.50	\$255.00	\$382.50
	Total Current Work			382.50
	Previous Balance			\$3,461.00
	Balance Due			<u>\$3,843.50</u>

### Task Code Summary

Task Code	Description	Fees	Expenses
C300	Analysis and Advice	76.50	0.00

Utilities, Inc.  
[REDACTED]

Page. 2  
01/04/2022

Account No. [REDACTED]  
Invoice No. 154371

		<u>Fees</u>	<u>Expenses</u>
C300	Analysis and Advice	76.50	0.00
L120	Analysis/Strategy	306.00	0.00
L100	Do not Use-See L110-L190 Case Assessment,Development &Admin	306.00	0.00

PAYMENT DUE UPON RECEIPT  
To ensure proper credit to your account  
Please write Account # [REDACTED] on your check  
Thank you

# STURGILL TURNER

\$137.50

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333 West Vine Street, Suite 1500  
Lexington, KY 40507  
p: 859.255.8581 f: 859.231.0851  
www.sturgillturner.com

Allen Wilt  
Corix Regulated Utilities  
500 W. Monroe  
Suite 3600  
Chicago, IL 60661-3779

## INVOICE OF SERVICES

Invoice Date: 06/06/2022  
Invoice No: 158688  
Account No: [REDACTED]

[REDACTED]

[REDACTED]

		Hours	
05/10/2022	MTO Review email from litigation counsel [REDACTED]	0.50	
	[REDACTED]	0.50	137.50
	For Current Services Rendered		

		<u>Recapitulation</u>		
<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
M. Todd Osterloh	Member	0.50	\$275.00	\$137.50

Total Current Work	137.50
Previous Balance	\$5,628.50
05/17/2022 Thank you for your payment.	-5,450.00
05/31/2022 Thank you for your payment.	-178.50
Total Payments	-5,628.50
Balance Due	<u>\$137.50</u>

PAYMENT DUE UPON RECEIPT  
To ensure proper credit to your account  
Please write Account [REDACTED] your check  
Thank you

\$ 790.50

# STURGILL TURNER

Sturgill, Turner, Barker & Moloney, PLLC  
333 West Vine Street, Suite 1500  
Lexington, KY 40507  
p: 859.255.8581 f: 859.231.0851  
www.sturgillturner.com

Employer I.D. No. 61-0576615

Allen Wilt  
Utilities, Inc.  
Allen Wilt  
Water Service Corp of, KY

## INVOICE OF SERVICES

Invoice Date: 08/03/2021  
Invoice No: 150346  
Account No: [REDACTED]  
PO# P91-2210-100170

[REDACTED]

Date	Timekeeper	Code	Activity	Hours	
06/22/2021	MTO	L120	A106 WSCK/Clinton - Communicate (with client) with S. Lubertozzi, M. Hofmeister, and others regarding [REDACTED]	1.50	
06/26/2021	MTO	C300	A104 Review documents forwarded by M. Hofmeister regarding [REDACTED] draft email to M. Hofmeister.	0.80	
07/13/2021	MTO	C300	A108 Communicate (other external) - [REDACTED] draft email to M. Hofmeister et al. regarding same.	0.50	
07/28/2021	MTO	L120	A108 Communicate (other external) [REDACTED] draft email to M. Hofmeister et al.	0.30	
			For Current Services Rendered	3.10	790.50

### Recapitulation

Timekeeper	Title	Hours	Hourly Rate	Total
M. Todd Osterloh	Member	3.10	\$255.00	\$790.50
	Total Current Work			790.50
	Balance Due			<u>\$790.50</u>

### Task Code Summary

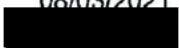
Code	Description	Fees	Expenses
C300	Analysis and Advice	331.50	0.00
C300	Analysis and Advice	331.50	0.00
L120	Analysis/Strategy	459.00	0.00
L100	Do not Use-See L110-L190 Case Assessment, Development & Admin	459.00	0.00

Utilities, Inc.




Page. 2  
08/03/2021

Account No.  
Invoice No.



150346

**PAYMENT DUE UPON RECEIPT**  
To ensure proper credit to your account  
Please write Account  on your check  
Thank you

# STURGILL TURNER

\$127.50

**Sturgill, Turner, Barker & Moloney, PLLC**  
 333 West Vine Street, Suite 1500  
 Lexington, KY 40507  
 p: 859.255.8581 f: 859.231.0851  
 www.sturgillturner.com

Employer I.D. No. 61-0576615

Allen Wilt  
 Utilities, Inc.  
 Allen Wilt  
 Water Service Corp of, KY

## INVOICE OF SERVICES

Invoice Date: 09/09/2021  
 Invoice No: 151498  
 Account No: [REDACTED]  
 PO# P91-2210-100170



08/16/2021	MTO	L120	A104	Review [REDACTED] draft email to WSCK team regarding same.	Hours	
					0.50	
				For Current Services Rendered	0.50	127.50

### Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
M. Todd Osterloh	Member	0.50	\$255.00	\$127.50
	Total Current Work			127.50
	Previous Balance			\$790.50
	Balance Due			<u>\$918.00</u>

### Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L120	Analysis/Strategy	127.50	0.00
L100	Do not Use-See L110-L190 Case Assessment, Development & Admin	127.50	0.00

**PAYMENT DUE UPON RECEIPT**  
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 Please write Account [REDACTED] on your check  
 Thank you



\$178.50

# STURGILL TURNER

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333 West Vine Street, Suite 1500  
Lexington, KY 40507  
p: 859.255.8581 f: 859.231.0851  
www.sturgillturner.com

Employer I.D. No. 61-0576615

Allen Wilt  
Utilities, Inc.  
Allen Wilt  
Water Service Corp of, KY

### INVOICE OF SERVICES

Invoice Date: 10/04/2021  
Invoice No: 152016  
Account No: [REDACTED]  
PO# P91-2210-100170

[REDACTED]

				Hours		
09/24/2021	MTO	L120	A104	Review [REDACTED] [REDACTED] from M. Hofmeister; draft email regarding same.	0.70	
					0.70	178.50

#### Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
M. Todd Osterloh	Member	0.70	\$255.00	\$178.50
Total Current Work				178.50
Previous Balance				\$918.00
Balance Due				<u>\$1,096.50</u>

#### Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L120	Analysis/Strategy	178.50	0.00
L100	Do not Use-See L110-L190 Case Assessment, Development & Admin	178.50	0.00

PAYMENT DUE UPON RECEIPT  
To ensure proper credit to your account  
Please write Account [REDACTED] on your check  
Thank you



# STURGILL TURNER

\$459

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333 West Vine Street, Suite 1500  
Lexington, KY 40507  
p: 859.255.8581 f: 859.231.0851  
www.sturgillturner.com

Employer I.D. No. 61-0576615

Allen Wilt  
Utilities, Inc.  
Allen Wilt  
Water Service Corp of, KY

## INVOICE OF SERVICES

Invoice Date: 11/02/2021  
Invoice No: 152710  
Account No: [REDACTED]  
PO# P91-2210-100170

[REDACTED]

					Hours	
10/06/2021	MTO	C300	A106	Communicate (with client) with S. Whitney regarding [REDACTED]	0.20	
10/07/2021	MTO	L120	A103	Draft/revise email [REDACTED] regarding [REDACTED]	0.20	
10/27/2021	MTO	L210	A108	Communicate (other external) [REDACTED] [REDACTED] draft emails to S. Whitney regarding same; phone call from S. Whitney to discuss.	0.80	
10/29/2021	MTO	L120	A108	Communicate (other external) [REDACTED]	0.30	
	MTO	L120	A106	Communicate (with client) [REDACTED]	0.30	
For Current Services Rendered					1.80	459.00

### Recapitulation

Timekeeper	Title	Hours	Hourly Rate	Total
M. Todd Osterloh	Member	1.80	\$255.00	\$459.00
Total Current Work				459.00
Previous Balance				\$1,096.50
Balance Due				<u>\$1,555.50</u>

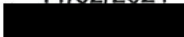
### Task Code Summary

		Fees	Expenses
C300	Analysis and Advice	51.00	0.00
C300	Analysis and Advice	51.00	0.00
L120	Analysis/Strategy	204.00	0.00

Utilities, Inc.




Account No.  
Invoice No.



152710

		<u>Fees</u>	<u>Expenses</u>
L100	Do not Use-See L110-L190 Case Assessment,Development &Admin	204.00	0.00
L210	Pleadings	204.00	0.00
L200	Do Not Use-See L210-L260 Pre-Trial Pleadings & Motions	204.00	0.00

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\$280.50

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Employer I.D. No. 61-0576615

Allen Wilt  
Utilities, Inc.  
Allen Wilt  
Water Service Corp of, KY

## INVOICE OF SERVICES

Invoice Date: 12/02/2021  
Invoice No: 153546  
Account No: [REDACTED]  
PO# P91-2210-100170

[REDACTED]

					Hours		
11/02/2021	MTO	L120	A104	Review changes [REDACTED]	0.30		
	MTO	L120	A106	Communicate (with client) - draft email to M. Hofmeister and S. Whitney [REDACTED]	0.30		
	MTO	L120	A104	Review case law [REDACTED]	0.50		
					1.10	280.50	

### Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
M. Todd Osterloh	Member	1.10	\$255.00	\$280.50
Total Current Work				280.50
Previous Balance				\$1,555.50
Balance Due				<u>\$1,836.00</u>

### Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L120	Analysis/Strategy	280.50	0.00
L100	Do not Use-See L110-L190 Case Assessment, Development & Admin	280.50	0.00

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# STURGILL TURNER

\$2,958

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p: 859.255.8581 f: 859.231.0851  
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Employer I.D. No. 61-0576615

Allen Wilt  
Utilities, Inc.  
Allen Wilt  
Water Service Corp of, KY

## INVOICE OF SERVICES

Invoice Date: 01/04/2022  
Invoice No: 154372  
Account No: [REDACTED]  
PO# P91-2210-100170

[REDACTED]

Date	Activity	Hours
12/02/2021	MTO L120 A106 Communicate (with client) with M. Hofmeister [REDACTED]	0.10
12/05/2021	MTO L120 A108 Communicate (other external) - draft response [REDACTED]	0.20
	MTO L120 A104 Review legal authorities [REDACTED]	3.80
12/09/2021	MTO C300 A109 Appear for/attend meeting with M. Hofmeister [REDACTED]	1.30
	MTO L120 A104 Review information from prior cases and tariffs [REDACTED]	2.30
12/10/2021	MTO L120 A104 Review materials from M. Hofmeister and [REDACTED]	0.50
12/16/2021	MTO L120 A106 Communicate (with client) - conference call with M. Hofmeister, S. Lubertozi, A. Wilt, and S. Whitney regarding [REDACTED]	0.50
	MTO L120 A108 Communicate (other external) with [REDACTED]	0.50
12/17/2021	MTO L120 A103 Draft/revise - continued work on [REDACTED]	1.80

Utilities, Inc.

Account No. [REDACTED]  
Invoice No.

154372

				Hours			
12/19/2021	MTO	L310	A106	Communicate (with client) and [REDACTED] [REDACTED]	0.40		
12/21/2021	MTO	C300	A104	Review and respond to email f [REDACTED] [REDACTED]	0.20		
					11.60	2,958.00	

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
M. Todd Osterloh	Member	11.60	\$255.00	\$2,958.00
Total Current Work				2,958.00
Previous Balance				\$1,836.00
Balance Due				<u>\$4,794.00</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
C300	Analysis and Advice	382.50	0.00
C300	Analysis and Advice	382.50	0.00
L120	Analysis/Strategy	2473.50	0.00
L100	Do not Use-See L110-L190 Case Assessment,Development &Admin	2,473.50	0.00
L310	Written Discovery	102.00	0.00
L300	Do Not Use - See L310-L390 Discovery	102.00	0.00

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\$171.50

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Lexington, KY 40507  
p: 859.255.8581 f: 859.231.0851  
www.sturgillturner.com

Employer I.D. No. 61-0576615

Allen Wilt  
Utilities, Inc.  
500 W. Monroe  
Suite 3600  
Chicago, IL 60661-3779

## INVOICE OF SERVICES

Invoice Date: 10/04/2021  
Invoice No: 152015  
Account No: [REDACTED]  
PO# P91-2210-100170

[REDACTED]

				Hours	
09/16/2021	MTO	L120	A106 Communicate (with client) with S. Whitney [REDACTED]	0.20	
09/24/2021	MTO	L120	A106 Communicate (with client) - draft emails to S. Whitney regarding [REDACTED]	0.50	
For Current Services Rendered				0.70	171.50

### Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
M. Todd Osterloh	Member	0.70	\$245.00	\$171.50
Total Current Work				171.50
Previous Balance				\$1,224.00
Balance Due				<u>\$1,395.50</u>

### Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L120	Analysis/Strategy	171.50	0.00
L100	Do not Use-See L110-L190 Case Assessment, Development & Admin	171.50	0.00

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\$1,683

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Lexington, KY 40507  
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Employer I.D. No. 61-0576615

Allen Wilt  
Utilities, Inc.  
500 W. Monroe  
Suite 3600  
Chicago, IL 60661-3779

### INVOICE OF SERVICES

Invoice Date: 12/02/2021  
Invoice No: 153545  
Account No: [REDACTED]  
PO# P91-2210-100169

[REDACTED]

Date	Initials	Code	Description	Hours
11/01/2021	MTO	L120 A103	Draft/revise - drafting motion to [REDACTED];	0.50
	MTO	L120 A106	Communicate (with client) - phone call with S. Whitney to discuss [REDACTED]	0.30
11/04/2021	MTO	L210 A103	Draft/revise - [REDACTED]	2.30
	JWG	P270 A104	Review and comment on [REDACTED]	0.30
11/05/2021	MTO	L210 A103	Draft/revise - finalize [REDACTED]	0.60
11/10/2021	MTO	L120 A106	Communicate (with client) - conference call with M. Hofmelster, S. Whitney, and S. Elicegui regarding [REDACTED]	1.30
11/17/2021	MTO	L120 A106	Communicate (with client) with S. Whitney regarding [REDACTED]	0.40
11/18/2021	MTO	L120 A106	Communicate (with client) with S. Whitney regarding [REDACTED]	0.20
11/21/2021	MTO	C300 A104	Review [REDACTED]; draft email to S. Whitney and S. Vaughn regarding same.	0.20
11/22/2021	MTO	C300 A108	Communicate (other external) with Staff attorney and S. Whitney regarding [REDACTED]	0.20
11/30/2021	MTO	L210 A104	Review [REDACTED]; draft email to S. Whitney regarding same.	0.30
For Current Services Rendered				6.60
				1,683.00

Utilities, Inc.

Account No. [REDACTED]  
Invoice No.

153545

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
M. Todd Osterloh	Member	6.30	\$255.00	\$1,606.50
James W. Gardner	Of Counsel	0.30	255.00	76.50
Total Current Work				1,683.00
Previous Balance				\$1,778.00
Balance Due				<u>\$3,461.00</u>

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
C300 Analysis and Advice	102.00	0.00
C300 Analysis and Advice	102.00	0.00
L120 Analysis/Strategy	688.50	0.00
L100 Do not Use-See L110-L190 Case Assessment,Development &Admin	688.50	0.00
L210 Pleadings	816.00	0.00
L200 Do Not Use-See L210-L260 Pre-Trial Pleadings & Motions	816.00	0.00
P270 Regulatory Reviews	76.50	0.00
P200 Fact Gathering/Due Dilligence	76.50	0.00

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# STURGILL TURNER

\$1,020

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333 West Vine Street, Suite 1500  
Lexington, KY 40507  
p: 859.255.8581 f: 859.231.0851  
www.sturgillturner.com

Employer I.D. No. 61-0576615

Allen Wilt  
Utilities, Inc.  
500 W. Monroe  
Suite 3600  
Chicago, IL 60661-3779

## INVOICE OF SERVICES

Invoice Date: 02/02/2022  
Invoice No: 155011  
Account No: [REDACTED]  
PO# P91-2210-100169

[REDACTED]

						Hours
01/07/2022	MTO	L120	A103	Draft/revise letter [REDACTED]		0.30
01/09/2022	MTO	L120	A104	Review email [REDACTED]		0.20
01/10/2022	MTO	L120	A103	Draft/revise - review email from S. Whitney; draft email [REDACTED]		0.20
01/12/2022	MTO	L120	A106	Communicate (with client) with S. Whitney regarding [REDACTED]		0.20
01/18/2022	MTO	L210	A101	Prepare for conference call with S. Whitney et al. regarding [REDACTED]		0.30
	MTO	L210	A109	Appear for/attend meeting with S. Whitney, C. Wilson, and J. Kilbane regarding [REDACTED]		1.30
	MTO	L210	A103	Draft/revise analysis [REDACTED]		0.50
01/22/2022	MTO	C300	A104	Review and respond to emails from [REDACTED]		0.30
01/25/2022	MTO	L120	A109	Appear for/attend meeting with PSC Staff and S. Whitney, S. Lubertozzi, et al.		0.50
01/26/2022	MTO	L120	A104	Review and respond to email from S. Whitney; forward information to OAG A. Goad per request at yesterday's meeting.		0.20
For Current Services Rendered						4.00
						<u>1,020.00</u>

Utilities, Inc.

Account No. [REDACTED]  
Invoice No.

155011

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
M. Todd Osterloh	Member	4.00	\$255.00	\$1,020.00
	Total Current Work			1,020.00
	Previous Balance			\$3,843.50
	Balance Due			<u>\$4,863.50</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
C300	Analysis and Advice	<u>76.50</u>	<u>0.00</u>
C300	Analysis and Advice	<u>76.50</u>	<u>0.00</u>
L120	Analysis/Strategy	<u>408.00</u>	<u>0.00</u>
L100	Do not Use-See L110-L190 Case Assessment,Development &Admin	<u>408.00</u>	<u>0.00</u>
L210	Pleadings	<u>535.50</u>	<u>0.00</u>
L200	Do Not Use-See L210-L260 Pre-Trial Pleadings & Motions	<u>535.50</u>	<u>0.00</u>

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# STURGILL TURNER

\$586.50

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333 West Vine Street, Suite 1500  
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p: 859.255.8581 f: 859.231.0851  
www.sturgillturner.com

Employer I.D. No. 61-0576615

Allen Wilt  
500 W. Monroe  
Suite 3600  
Chicago, IL 60661-3779

## INVOICE OF SERVICES

Invoice Date: 03/07/2022  
Invoice No: 156709  
Account No: [REDACTED]

Carbon Copy - Do Not Pay

Date	Timekeeper	Code	Activity	Hours
02/15/2022	MTO	C300	A104 Review email from A. Wilt regarding [REDACTED] review [REDACTED] draft response	0.50
02/16/2022	MTO	L120	A104 Review materials filed [REDACTED]	0.50
	MTO	L120	A109 Appear for/attend meeting with A. Witt and J. Pruitt to [REDACTED]	0.30
02/18/2022	MTO	C300	A104 Review email [REDACTED] to S. Whitney.	0.30
02/25/2022	MTO	C300	A103 Draft/revise proposed response [REDACTED]	0.50
	MTO	C300	A104 Review [REDACTED] draft email to client regarding same (time split with other clients)	0.20
			For Current Services Rendered	2.30
				586.50

### Recapitulation

Timekeeper	Title	Hours	Hourly Rate	Total
M. Todd Osterloh	Member	2.30	\$255.00	\$586.50
	Total Current Work			586.50
	Previous Balance			\$4,863.50
	Balance Due			<u>\$5,450.00</u>

Allen Wilt

Account No. [REDACTED]

[REDACTED]

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
C300	Analysis and Advice	382.50	0.00
C300	Analysis and Advice	382.50	0.00
L120	Analysis/Strategy	204.00	0.00
L100	Do not Use-See L110-L190 Case Assessment,Development &Admin	204.00	0.00

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\$178.50

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Employer I.D. No. 61-0576615

Allen Wilt  
Utilities, Inc.  
500 W. Monroe  
Suite 3600  
Chicago, IL 60661-3779

## INVOICE OF SERVICES

Invoice Date: 05/03/2022  
Invoice No: 157875  
Account No: [REDACTED]

[REDACTED]

			Hours	
04/02/2022	MTO	Communicate (with client) - review and respond to questions from S. Whitney regarding [REDACTED]	0.40	
04/26/2022	MTO	Communicate (with client) - phone call from S. Whitney regarding [REDACTED] review and respond to email from S. Whitney [REDACTED]	0.30	
		For Current Services Rendered	0.70	178.50

### Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
M. Todd Osterloh	Member	0.70	\$255.00	\$178.50
Total Current Work				178.50
Previous Balance				\$5,450.00
Balance Due				<u>\$5,628.50</u>

### Past Due Amounts

<u>Stmt Date</u>	<u>Stmt #</u>	<u>Billed</u>	<u>Due</u>
09/09/2021	151497	1,224.00	1,224.00
10/04/2021	152015	171.50	171.50
11/02/2021	152709	382.50	382.50
12/02/2021	153545	1,683.00	1,683.00
01/04/2022	154371	382.50	382.50
02/02/2022	155011	1,020.00	1,020.00
03/07/2022	156709	586.50	586.50
			<u>5,450.00</u>

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\$137.50

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www.sturgillturner.com

Employer I.D. No. 61-0576615

Allen Wilt  
Corix Regulated Utilities  
500 W. Monroe  
Suite 3600  
Chicago, IL 60661-3779

INVOICE OF SERVICES

Invoice Date: 07/06/2022  
Invoice No: 159368  
Account No: [REDACTED]

[REDACTED]

PO# P91-2210-100169

Previous Balance \$137.50

Balance Due \$137.50

<u>Stmt Date</u>	<u>Stmt #</u>	<u>Past Due Amounts</u>	<u>Billed</u>	<u>Due</u>
06/06/2022	158688		137.50	<u>137.50</u>
				137.50

PAYMENT DUE UPON RECEIPT  
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Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-55:**

Refer to Water Service Kentucky's response to the Attorney General's First Request, Item 105, including the Excel file AG DR 1-105 Captime attached to the response. Refer also to the projected capitalized time expense in account 522001 of (\$138,212), which is a significant increase over prior years, depicted in the Application, Exhibit 29.4. Refer also to the reflection of capitalized labor associated with the AMI project included in the Excel file PSC\_DR\_1-49\_Exhibit\_41\_-AMI\_cost\_impacts\_REDACTED attached to Water Service Kentucky's response to the Commission Staff's First Request for Information ("Staff's First Request"), Item 49, and further to cell G32 in worksheet tab Quote and Details, which shows capitalized time of \$79,476 in 2023 for AMI meter installations. Finally, refer to the depiction of the revenue requirement for the impacts of AMI provided in Water Service Kentucky's response to the Attorney General's First Request, Item 102, which shows nothing related to labor or the effects of capitalized labor reductions for the AMI program.

a. Confirm that the \$79,476 in capitalized time expense associated with the AMI program is the amount of capitalized labor reflected for the AMI program in the Application, Exhibit 29.4. If not confirmed, provide the correct amount and an explanation of the same.

b. Explain why there is no reflection of capitalized time expense in either the Application, Exhibit 41, or in the revenue requirement depiction for AMI provided in Water Service Kentucky's response to the Attorney General's First Request, Item 102, and discuss whether there should be such a reflection.

c. Indicate whether the reflection of both the AMI costs and capitalized time expense in the revenue requirement equates to a decrease in the revenue requirement associated with AMI,



Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

or if there would also need to be consideration of the vacant positions and whether the Company should staff back up to the level of 19 employees. Explain the response in full detail.

d. Describe what employees (by position description) will be involved with the projected 1,913 meter installations in 2023 taking one hour each, which is approximately one full-time equivalent, and how the work will be performed.

e. Does the Company envision performing all the Phase I meter installations in 2023, or will the installations be spread over 2023 and 2024? If all will be installed in 2023, explain why in detail.

f. If the Commission denies the proposed AMI project, would the Company still need the approximate one full-time equivalent for other job functions and projected labor costs assuming full staffing levels. If yes, explain why in detail.

g. If the Commission denies the proposed AMI project, detail the changes that would need to be made to the Company's depiction of the revenue requirement in the test year related to labor expense and capitalized time expense.

h. Describe how the \$41.65 captime cost per hour rate was determined, which is used in the capitalized labor calculation. Include in the description the group of employees assumed to be included in the calculation of that rate.

**Response:**

a. It is not confirmed - the dollar amount in PSC\_DR\_1-49\_Exhibit\_41\_- AMI\_cost\_impacts\_REDACTED stated for captime for the AMI project is \$79,676, not \$79,476 as stated in this data request. This amount is included in Application Exhibit 29.4.

b. The Company did not reflect the captime activity during the Phase 1, 2, and 3 installations as they are not recurring or normalized charges, though the remaining costs depicted in the



Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

referenced files are recurring revenue requirement components. However, please see attached revised file AG DR 2-55 - Exhibit 41 - AMI cost impacts REDACTED - Forecast Period REVISED.xlsx, which adds captime as a revenue requirement component as relevant for each phase of the AMI project.

c. Please see attachment in response to part B above. The Company's revenue requirement calculations in the current case reflect full staffing levels.

d. All field tech I and II positions will have a set number of meters to install each work day once their normal meter reading route is complete. That results in approximately 382 meters per the 5 employees dedicated to this task. Therefore, each employee (minus vacation and holidays) will have to install approximately 2 meters a day until completion.

e. The current plan is to complete the meter installations for phase 1 all in 2023. The Company plans to install all phase 1 meters as soon as possible to allow the benefits of the meters to be recognized earlier and mitigate issues with existing meters.

f. Yes, this project does not require any new positions, and sufficient work remains for existing employee levels, which are consistent with prior years.

g. If the Commission were to deny the AMI project request, the revenue requirement for the Forecast Period would decrease for the items noted as Expenses in the file attached in response to B above, and rate base would decrease by the 13-month average cost of the AMI project as shown in the file AG DR 1-072 - Exhibits 10-20-28 - Schedule A - Rate Base Components Updated 7.28.22.xlsx, Pro-Forma UPIS-AD-ADIT tab – removing the fixed asset additions in this tab for AMI will reduce the A/D and ADIT credit balances.

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

h. The \$41.65 rate includes all Kentucky-only employees' salaries, benefits, payroll taxes, and transportation expense, divided by 2000 hours per employee, which is based on 2080 annual work hours minus 2 weeks of PTO.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-56:**

Refer to the reflection of the proforma income statement in the Application, Exhibit 29. Refer also to the detailed account descriptions and data included in the Application, Exhibits 29.7 (Maintenance and Repair), 29.8 (Maintenance Testing), 29.9 (Chemicals) 29.10 (Transportation), 29.11 (Outside Services), 29.12 (Office Supplies and Other Expense), 29.14 (Pension and Other Benefits), 29.16 (Insurance Expense), 29.17 (Office Utilities), 29.18 (Miscellaneous Expense), and 29.22 (Taxes other than Income). Provide similar schedules for each exhibit noted above which depict the same level of account detail for the sum of 2022 revenues and expenses to date through the most recent month with actual data available. In addition, identify the most recent month with available data.

**Response:**

Please see Excel file AG DR 2-56 Expense details Aug YTD. The file shows expenses through August 2022.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-57:**

Refer to the projected Income Statement information provided in the Application, Exhibit 29. Provide a similar schedule which shows the same level of detail for each of the months in 2022, and year to date, through the most recent month with actual data available.

**Response:**

Please see Excel file AG DR 2-57 – Monthly Income Statements.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-58:**

Refer to the public version of Excel file PSC\_DR\_1-49\_Exhibits\_18-32-29\_-\_Schedule\_B\_-\_SW-Payroll\_Taxes-Benefits\_REDACTED attached to Water Service Kentucky's response to Staff's First Request, Item 49. Refer further to worksheet tab 2023 and further to cell AS1 which depicts an assumed increase in health insurance benefits cost of 6% over base year costs in order to project health insurance costs in the test year. Provide the weighted average actual annual increase percentages in health care premium costs each year starting in 2017 and going through 2022.

**Response:**

The compound annual growth rate from 2017 and 2022 was approximately 4.4%. This CAGR is artificially low due to the 2020 consolidation of the CRU (formerly Utilities Inc.) benefit plan into the CII benefits plan, which resulted in cost savings. Due to COVID impacts on healthcare cost and inflationary pressures the Company believes that 2023 will be similar if not greater than the most recent annual increase experienced from 2021 to 2022 of 8%.

Please see Excel AG DR 2-58 Medical Rates 2017 – 2022.xlsx for calculations.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-59:**

Refer to the public version Excel file PSC DR 1-49 Exhibit 29 - Schedule A - Revenue Build - AS FILED REVISED REDACTED and further to worksheet tab Usage Decline. The annual date reflected shows an increase year over year in usage per ERC starting in 2016 and going through 2019 and then a sharp decrease in 2020 and 2021 before increasing again in 2022. Describe all known reasons for the sharp decline in 2020 and 2021, including the ramifications of Covid-19, compared to the usage per ERC that had been building from 2016 through 2019.

**Response:**

The Company does not have enough data to support a conclusive explanation. The Company does not identify any significant statistical variance - such as 2 standard deviations above or below the average - between 2020 and 2021 versus non-COVID years.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-60:**

Refer to the public version Excel file PSC DR 1-49 Exhibit 29 - Schedule A - Revenue Build - AS FILED REVISED REDACTED and further to worksheet tab Customer Decline. Refer also to the previous question and the small increase in customers depicted for 2022 when compared to 2021. Does the Company believe that it experienced a decline in customers in 2020 and 2021 related to the ramifications of Covid-19? Explain the answer in full detail.

**Response:**

The Company recognizes a declining trend in ERCs from 2013 to 2021 which is in line with a declining population in Middlesboro and Clinton according to the most recent census data. The Company does not have enough information to conclude that changes in 2020 or 2021 were due to Covid-19 or any other particular factor. The declines in 2020 and 2021 do not appear statistically significant compared to other years included in Application Exhibit 29 Schedule A.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-61:**

Refer to the Excel file AG\_DR\_1-82\_ and\_ 84\_ IS\_ and\_ DS attached to Water Service Kentucky's responses to the Attorney General's First Request, Items 82 and 84, and further to the worksheet tab Pension and Other Benefits and further to the amounts reflected for account 532005 (Employee Insurance Deductions) and account 532006 (Health Insurance Claims) for 2019 through the base year. Refer also to the Excel file PSC\_DR\_1-38\_-\_Schedule\_K\_-\_Payroll\_Info attached to Water Service Kentucky's response to Staff's First Request, Item 38, which shows in different tabs the breakdown of payroll costs, including the Company's and employees' portion of health insurance costs each year for 2019 through the base year. Explain all reasons why the amounts between these two sources for each year do not match.

**Response:**

The PSC\_DR\_1-38\_-\_Schedule\_K\_-\_Payroll is derived from payroll data related to specified Kentucky related employees and the AG\_DR\_1-82\_ and\_ 84\_ IS\_ and\_ DS is taken from the general ledger amounts posted. Until 2021 the cost that would be expensed to 532006 and 532005 included allocated cost from shared services. In 2021 the allocation method was changed, as WSC shared services costs were consolidated with Corix support services before allocation. Accounting GL entries may include timing differences, non-payroll related cost and journal entries that don't necessarily get tied to a specific employee. Also, while in 2021 there were reorganization changes in responsibilities that were enacted, the general ledger changes to reflect the reorganization were not implemented in the ERP system until 2022..

**Witness:**

James Kilbane



Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-62:**

Refer to the Excel file PSC\_DR\_1-38\_-\_Schedule\_K\_-\_Payroll\_Info attached to Water Service Kentucky's response to Staff's First Request, Item 38 which shows in different tabs the breakdown of payroll costs, including the Company's and employees' portion of health insurance costs each year for 2019 through the base year. Refer specifically to the worksheet tabs for 2021 and the base year, which shows the following total costs for each:

	<u>2021</u>	<u>Base Year</u>	<u>Increase %</u>
Health Insurance Costs – Utility	\$140,715	\$177,832	26.4%
Health Insurance Costs – Employee	\$37,933	\$47,888	26.2%

Explain all reasons why the amounts for both the utility and employee responsibilities increase by over 26% from 2021 to the base year.

**Response:**

Health care cost increased on average 8% between 2021 and 2022. The 2021 dollars were based on the actuals incurred by the Company and the Base Period represents what the Company would expect at full manning. There were various positions open at different times in 2021 that have since been filled with the exception of the Director of Engineering and Asset Management position.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-63:**

Refer to the Excel file AG\_DR\_1-82\_ and\_ 84\_ IS\_ and\_ DS attached to Water Service Kentucky's responses to the Attorney General's First Request, Items 82 and 84, and further to the worksheet tab Income Statement which shows amounts for miscellaneous revenues per year excerpted below. Describe what types of revenue have been or will be recorded each year from 2017 through the test year. Also, explain all known reasons why the amounts for such revenues started decreasing significantly in 2020 and appear to be virtually non-existent in the base year and test year.

	2017	2018	2019	2020	2021	Base Period	Forecasted Period
Miscellaneous Revenues	62,803	56,935	58,287	34,418	7,698	297	297

**Response:**

Through the 2020 rate case, the Company charged: NSF fees, meter testing, service reconnection charges, and tampering fees. The conclusion the 2020 rate case changed the reconnection charges to zero. In the Forecast Period, these revenues include a nominal level of NSF fees and meter testing fees.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-64:**

Refer to the Excel file PSC DR 1-50 Fuel Cost Estimated attached to Water Service Kentucky's response to Staff's First Request, Item 50, and further to the use of the average per gallon price of \$3.92 as of May 5, 2022, utilized to project the cost of fuel expense in the test year. Provide the most current per gallon price of gas at the stations utilized by the Company and the date in which the price is determined.

**Response:**

The recent purchases of vehicle fuel as of 9/21/2022 at local stations was \$2.96 regular and \$4.79 diesel. Assuming 80% of all gas purchased for the Kentucky operations uses regular gasoline and the 2 service trucks and backhoes use diesel, this fuel price would be \$3.33 as a blended rate. Please see attached Excel AG DR 2-64 Fuel Cost Estimated for most recent estimate.

**Witness:**

Colby Wilson / James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-65:**

Refer to the revised Attachment filed in response to the Attorney General's First Request, Item 41 on August 16, 2022. Refer further to the "WSCK Health Benefit Cost" column of the tab detailing 2022 compensation costs showing the Company's health benefit costs related to each employee for 2022.

- a. Explain why the amounts for each employee in the "WSCK Health Benefit Cost" column are different and why some amounts are over three times the amount of others.
- b. For each different amount listed, identify what type of coverage that is included (e.g. employee only, employee plus spouse, employee plus children, family, etc.).
- c. For each different type of coverage identified in the response to subpart (b), identify the total amount of the coverage costs projected, and the costs projected to be paid for by the Company and the amount paid by the employee.

**Response:**

- a. Employees have the option of different health care coverage including supplemental coverage and whether they elect to have coverage for employee only, employee plus spouse, employee plus children, or family coverage.
- b and c. Please see Excel file AG DR 2-65 Health expense info. There are multiple options in health care offerings, some options include supplemental health insurance and different overall plans such as high deductible or PPO, that is why there will be several different rates for the same category of coverage.

**Witness:**

James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-66:**

Refer to the Excel attachment entitled “PSC\_DR\_1-49\_Exhibit\_35\_-\_Schedule\_A\_-\_Cost\_of\_Capital\_Summary\_v2’ provided in response to the Staff’s First Request, Item 49 and to Water Service Kentucky’s response to the Attorney General’s First Request, Item 89.

a. Provide an update as to whether any plans have changed in regard to the payoff of the \$80 million revolver balance and the issuance of two \$50 million debt issuances on October 1, 2022, with projected interest rates of 4.05% and 4.30%. Detail any possible or known changes to any of the projected amounts or interest rates.

b. Provide the current interest rate and balance of the \$80 million revolver.

**Response:** Please see attached Excel file AG DR 2-66 Exhibit\_35\_-\_Schedule\_A\_-\_Cost\_of\_Capital\_Summary\_Update.xlsx. This file updates the Forecast Period and Base Period capital structures and inputs based on recent activity. Included in this file is updated actual balances and rates as of 8/31/2022. The new issuance dated 6/27/2022 of \$50 million requires a draw of the remaining \$25 million on the note within one year.

**Witness:** James Kilbane

Case No. 2022-00147  
Water Service Corporation of Kentucky  
Responses to Attorney General Second Request for Information

**AG DR 2-67:**

Refer to the August 29, 2022 merger announcement between Southwest Water Company and Corix Infrastructure, Inc. with a projected close date by the end of 2023. Describe all changes anticipated to the level of allocated or direct costs applicable to Water Service Kentucky that should be considered as part of the instant case. If there are no changes anticipated explain why in full detail.

**Response:** Based on the various conditions that all must be met in order to close the transaction – including approximately 21 regulatory approvals across 18 regulatory jurisdictions - the Company does not expect the transaction to close before 12/31/2023. For example, the California Public Utilities Commission has a 12-18 month statutory period for merger approvals. Any integration activities would not be implemented until the transaction closes. The Forecast Period of the current case extends to 12/31/2023, and therefore, there are no expected allocated or direct costs for WSCK that are expected to be impacted for the current case.

**Witness:** Seth Whitney

**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** )

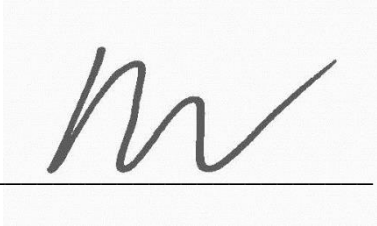
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**CERTIFICATION**

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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 Fourth Data Request and the Attorney General's Second 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: 09/29/2022

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