Water Service Corporation of Kentucky Response to Commission Staff's First Request for Information

Commission Staff 1-3:

As the historical data becomes available, provide detailed monthly income statements for each forecasted month of the base period including the month in which the Commission hears this case.

Original Response:

Please see Excel file "PSC DR 1-03 – Monthly Income Statements." This includes monthly income statements through the period ending May 2022.

Supplemental Response (7/28/22):

Please see Excel file "PSC DR 1-03 – Monthly Income Statements July Supplement." This includes monthly income statements through the period ending June 2022.

Supplemental Response (8/29/22):

Please see Excel file "PSC DR 1-03 – Monthly Income Statements August Supplement." This includes monthly income statements through the period ending July 2022.

Supplemental Response (9/29/22):

Please see Excel file "PSC DR 1-03 – Monthly Income Statements September Supplement." This includes monthly income statements through the period ending July 2022.

Witness:

James Kilbane

Water Service Corporation of Kentucky Response to Commission Staff's First Request for Information

Commission Staff 1-4:

Provide the utility's cash account balances at the beginning of the most recent calendar year and at the end of each month through the date of this request.

Original Response:

Please see Excel file "PSC DR 1-04 – Cash Balances."

Supplemental Response (7/28/22):

Please see Excel file "PSC DR 1-04 – Cash Balances July Supplement."

Supplemental Response (8/29/22):

Please see Excel file "PSC DR 1-04 – Cash Balances August Supplement."

Supplemental Response (9/29/22):

Please see Excel file "PSC DR 1-04 – Cash Balances September Supplement."

Witness:

James Kilbane

Water Service Corporation of Kentucky Response to Commission Staff's First Request for Information

Commission Staff 1-12:

Provide the following information concerning the costs for the preparation of this case:

- a. A detailed schedule of expenses incurred to date for the following categories:
 - (1) Accounting;
 - (2) Engineering;
 - (3) Legal;
 - (4) Consultants; and
 - (5) Other Expenses (Identify separately).
- b. For each category identified in Item 14.a., the schedule should include the date of each transaction, check number or other document reference, the vendor, the hours worked, the rates per hour, amount, a description of the services performed, and the account number in which the expenditure was recorded. Provide copies of contracts or other documentation that support charges incurred in the preparation of this case. Identify any costs incurred for this case that occurred during the base period.
- c. An itemized estimate of the total cost to be incurred for this case. Expenses should be broken down into the same categories as identified in Item 14(a), with an estimate of the hours to be worked and the rates per hour. Include a detailed explanation of how the estimate was determined, along with all supporting workpapers and calculations.
- d. Provide monthly updates of the actual costs incurred in conjunction with this rate case, reported in the manner requested in Items 14.a. and 14.b., and a cumulative total of cost incurred to date for each category. Updates will be due when the utility files its monthly financial statements with the Commission, through the month of the public hearing.

Response:

Water Service Corporation of Kentucky

Response to Commission Staff's First Request for Information

Please see Excel file "PSC DR 1-12 – Rate Case Expenses;" please also see attached supporting

documentation "PSC DR 1-12 – Rate Case expenses" below.

Supplemental Response (7/28/22):

Please see Excel file "PSC DR 1-12 – Rate Case Expenses July Supplement;" please also see

attached additional supporting documentation below.

Supplemental Response (8/29/22):

Please see Excel file "PSC DR 1-12 – Rate Case Expenses August Supplement;" please also see

attached additional supporting documentation below.

Supplemental Response (9/29/22):

Please see Excel file "PSC DR 1-12 – Rate Case Expenses September Supplement;" please also

see attached additional supporting documentation below.

Witness:

James Kilbane



Invoice No. 01-2162392 August 31, 2022

James Kilbane Water Service Corporation of Kentucky 1921 Hamilton Ave. Cleveland, OH 44114

Re:

2022/2023 Rate Case, #2022213.

Our Matter No. 069810.10001

2022213

INVOICE SUMMARY

For Services rendered through July 31, 2022

Professional Services	\$5,411.00
Total Current Invoice	\$5,411.00

Previous Balance Due \$24,738.50

Total Balance Due \$30,149.50

Thank you for giving Ice Miller the opportunity to serve you. We appreciate your business and the confidence you have placed in us. Please call if we can be of further assistance.



New payment option for you. You can now pay your invoice by **E-check**.

Find out more by contacting PAYICE@icemiller.com.

2022213

PROFESSIONAL SERVICES

Date	Initials	Description	Hours
06/06/2022	ALSO M	Emails with local counsel.	0.20
06/08/2022	PASH K	Teams meeting regarding deficiencies.	0.50
06/08/2022	ALSO M	Reviewed notice of deficiency; call with client to address response.	0.80
07/20/2022	PASH K	Teams meeting regarding data responses.	1.00
07/20/2022	ALSO M	Reviewed Staff and AG DR sets; call with client regarding the same.	1.90
07/22/2022	PASH K	Meeting regarding data requests and data responses.	1.00
07/22/2022	ALSO M	Reviewed AG DR set; call with client regarding the same.	1.50
07/25/2022	PASH K	Reviewed various data responses.	0.50
07/25/2022	ALSO M	Worked on responses to AG Set 1 and PS Set 2; call with client regarding the same DR sets.	2.60
07/26/2022	ALSO M	Review and comment on various items in Staff Set 2 and AG Set 1.	0.90
07/27/2022	PASH K	Reviewed data responses.	0.70
07/28/2022	PASH K	Rate case meeting.	0.50
07/28/2022	ALSO M	Final review and call regarding AG Set 1 and Staff Set 2 discovery responses.	0.70
Total Profess	ional Services		\$5,411.00

SUMMARY OF PROFESSIONAL SERVICES

Attorney	Hours	Rate	Amount
Mark Alson	8.60	\$385.00	\$3,311.00
Kay Pashos	4.20	\$500.00	\$2,100.00
Total Professional Services	12.80		\$5,411.00

Total Invoice Balance Due

\$5,411.00

2022213

OUTSTANDING INVOICES

Date	Invoice		Amount	Payments	Balance Due
08/31/22	01-2162392		\$5,411.00	\$0.00	\$5,411.00
08/31/22	01-2162393		\$24,738.50	\$0.00	\$24,738.50
			Total Outstanding Balance Due		\$30,149.50
		AGI	ED AR		
Current	31-60 days	61-90 days	91-120 days	120 days +	Total
330,149.50	\$0.00	\$0.00	\$0.00	\$0.00	\$30,149.50

Payment Terms: Net 30. Interest charges may accrue on past due balance.

Questions or concerns, please email payice@icemiller.com.



James Kilbane Water Service Corporation of Kentucky 1921 Hamilton Ave. Cleveland, OH 44114 Invoice No. 01-2162392 August 31, 2022

Re:

2022/2023 Rate Case, #2022213. Our Matter No. 069810.10001 2022213

INVOICE SUMMARY

For Services rendered through July 31, 2022

Professional Services

\$5,411.00

Total Current Invoice

\$5,411.00

Previous Balance Due

\$24,738.50

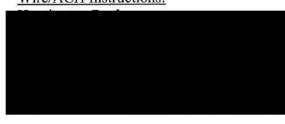
Total Balance Due

\$30,149.50

Payment Options

Online Payments:
Click the logo below or visit
www.clientpay.com/login.
ClientPay





Payment by check Remit to: Ice Miller LLP P.O. Box 68 Indianapolis, IN 46206-0068

Please include remittance or reference

Questions or concerns, please email payice@icemiller.com.

Payment Terms: Net 30



Invoice No. 01-2162393 August 31, 2022

James Kilbane
Water Service Corporation of Kentucky
1921 Hamilton Ave.
Cleveland, OH 44114

Re:

2022/2023 Rate Case, #2022213. Our Matter No. 069810.10001 2022213

INVOICE SUMMARY

For Services rendered through May 31, 2022

Professional Services

\$23,288.50

Total Current Invoice

\$23,288.50

Thank you for giving Ice Miller the opportunity to serve you. We appreciate your business and the confidence you have placed in us. Please call if we can be of further assistance.



New payment option for you. You can now pay your invoice by **E-check**.

Find out more by contacting PAYICE@icemiller.com.

2022213

PROFESSIONAL SERVICES

Date	Initials	Description	Hours
05/02/2022	PASH K	Teams meeting to discuss S. Whitney rate case testimony.	0.50
05/02/2022	ALSO M	Completed initial draft of Wilson's direct testimony; email to client regarding the same.	2.10
05/03/2022	ALSO M	Emails regarding testimony preparation.	0.30
05/04/2022	PASH K	Reviewed Baryenbruch draft testimony.	1.20
05/04/2022	PASH K	Weekly rate case meeting.	0.50
05/05/2022	ALSO M	Call regarding direct testimony preparation; follow up emails; further work on Wilson direct; reviewed Elicegui direct testimony.	2.40
05/06/2022	PASH K	Rate case discussion regarding capital projects.	1.00
05/06/2022	ALSO M	Call with client regarding direct testimony preparation; follow up emails.	0.90
05/10/2022	ALSO M	Review of latest version of Wilson direct testimony, and provided extensive revisions thereto; email to client.	2.80
05/11/2022	PASH K	Weekly rate case meeting.	0.50
05/13/2022	PASH K	Rate case meeting.	1.00
05/13/2022	ALSO M	Further revisions to Wilson direct testimony; call with client regarding preparation of testimony, MFRs, and related items.	1.30
05/16/2022	BEYR K	Reviewed last rate case order in consideration of highly contested issues.	1.20
05/17/2022	ALSO M	Revisions to Wilson direct testimony; researched of issues from prior rate case.	0.80
05/18/2022	PASH K	Weekly rate case meeting.	0.50
05/18/2022	ALSO M	Reviewed issue list and worked on Wilson testimony; rate case call with group to discuss testimony and outstanding issues; further revisions to Wilson direct testimony.	3.90
05/20/2022	PASH K	Meeting on rate case.	1.00
05/20/2022	ALSO M	Revisions to Wilson direct testimony; emails with client; touchbase call with entire Kentucky team to discuss rate case items.	1.20
05/21/2022	ALSO M	Worked on Watkins and Kilbane rebuttal; emails.	2.90

2022213

Total Profess	sional Services		\$23,288.50
05/31/2022	ALSO M	Assisted with finalization of direct application, testimony, and associated exhibits.	4.30
05/30/2022	ALSO M	Assisted with near-final review of testimony; addressed emails.	0.80
05/29/2022	ALSO M	Review of all remaining pieces of direct testimony, cleaning edits and adding final comments; comprehensive email to client group.	3.60
05/28/2022	ALSO M	Reviewed direct testimony and added suggested edits.	1.10
05/27/2022	ALSO M	Assisted with near-final revisions to direct testimony of Wilson, Whitney, and Kilbane; emails with client.	1.10
05/26/2022	ALSO M	Weekly rate case call; follow up regarding application, exhibits, and Whitney direct.	2.60
05/26/2022	PASH K	Rate case meeting.	0.50
05/26/2022	PASH K	Reviewed draft application and testimony.	3.50
05/26/2022	PASH K	Revised and edited Kilbourne's testimony.	1.80
05/25/2022	ALSO M	Call with Elicegui regarding testimony; follow up; review of consultant direct.	2.20
05/25/2022	PASH K	Meeting on rate case testimony.	1.00
05/24/2022	ALSO M	Elicegui testimony review; Kilbane testimony review.	2.10
05/24/2022	ALSO M	Weekly rate case call; revised Wilson direct; emails.	2.90
05/24/2022	PASH K	Weekly rate case meeting.	0.50
05/23/2022	ALSO M	Reviewed application and MSFR requirement and exhibits; Wilson direct review.	2.80

SUMMARY OF PROFESSIONAL SERVICES

Attorney	Hours	Rate	Amount
Mark Alson	42.10	\$385.00	\$16,208.50
Kay Pashos	13.50	\$500.00	\$6,750.00
Kelly Beyrer	1.20	\$275.00	\$330.00
Total Professional Services	56.80	9	\$23,288.50

2022/2023 Rate Case, #2022213. Our Matter No. 069810.10001 Invoice No. 01-2162393 August 31, 2022

2022213

. .

Total Invoice Balance Due

\$23,288.50

Payment Terms: Net 30. Interest charges may accrue on past due balance.

Questions or concerns, please email payice@icemiller.com.



James Kilbane
Water Service Corporation of Kentucky
1921 Hamilton Ave.
Cleveland, OH 44114

Invoice No. 01-2162393 August 31, 2022

Re:

2022/2023 Rate Case, #2022213. Our Matter No. 069810.10001 2022213

INVOICE SUMMARY

For Services rendered through May 31, 2022

Professional Services

\$23,288.50

Total Current Invoice

\$23,288.50

Payment Options

Online Payments: Click the logo below or visit www.clientpay.com/login.

ClientPay

Wire/ACH Instructions:

Payment by check Remit to: Ice Miller LLP P.O. Box 68 Indianapolis, IN 46206-0068

Please include remittance or reference <u>Invoice No. 01-2162393</u>

Questions or concerns, please email payice@icemiller.com.

Payment Terms: Net 30

Smart. Focused. Done Right.

ScottMadden, Inc. 2626 Glenwood Avenue Suite 480 Raleigh, NC 27608 919-781-4191 scottmadden.com

July 28, 2022 Invoice Number: 021338

PO Number: P91-2210-100186

Accounts Payable Water Service Corporation of Kentucky 500 W. Monroe Street Suite 3600 Chicago, IL 60661

In Reference To: Professional services provided in June 2022 for project 197-004

WSK Wage and Benefit Study

	A m ount		
Professional Fees	\$	1,080.00	
Total Fees and Expenses	\$	1,080.00	
Total Due	\$	1,080.00	

If you have any questions regarding this invoice, please let me know. Please remit payment in U.S. funds to: ScottMadden, PO Box 935955, Atlanta, GA 31193-5955. Thank you for retaining ScottMadden.

Sincerely,

Dylan D'Ascendis

Partner

ScottMadden, Inc.

Tax ID:

Project

WSK Wage and Benefit Study

In Reference to:

Professional services provided in June 2022 for project 197-004

Professional Fees		Current <u>Hours</u>	<u>Rate</u>	Current <u>Amount</u>
Quentin Watkins	6/27/2022	4.00	270.00	1,080.00
Workpapers				
	Professional Fees	4.00		1,080.00

Smart. Focused. Done Right.

ScottMadden, Inc. 2626 Glenwood Avenue Suite 480 Raleigh, NC 27608 919-781-4191 scottmadden.com

August 26, 2022 Invoice Number: 021469

PO Number: P91-2210-100186

Accounts Payable 500 W. Monroe Street Water Service Corporation of Kentucky Suite 3600 Chicago, IL 60661

In Reference To: Professional services provided in July 2022 for project 197-003

WSK Rate of Return Study

		A m ount		
1	Professional Fees	\$	4,262.50	
1	Total Fees and Expenses	\$	4,262.50	
	Total Due	\$	4,262.50	

If you have any questions regarding this invoice, please let me know. Please remit payment in U.S. funds to: ScottMadden, PO Box 935955, Atlanta, GA 31193-5955. Thank you for retaining ScottMadden.

Sincerely,

Dylan D'Ascendis

Partner

ScottMadden, Inc.

Tax ID:

Project WSK Rate of Return Study

In Reference to: Professional services provided in July 2022 for project 197-003

Current Hours Rate Amo fessional Fees Lan D'Ascendis 7/20/2022 2.50 325.00 81 covery responses dsay Cellars 7/5/2022 4.00 230.00 92 cisted with discovery responses. dsay Cellars 7/6/2022 4.00 230.00 92 cisted with discovery responses. ndsay Cellars 7/6/2022 4.00 230.00 92 cisted with discovery responses.
Lan D'Ascendis 7/20/2022 2.50 325.00 81 covery responses 7/5/2022 4.00 230.00 92 isted with discovery responses. Indicated with discovery responses. Indicated with discovery responses.
isted with discovery responses. 7/5/2022 4.00 230.00 92 7/6/2022 4.00 230.00 92 1 isted with discovery responses.
isted with discovery responses. 7/5/2022 4.00 230.00 92 isted with discovery responses. 7/6/2022 4.00 230.00 92 isted with discovery responses.
isted with discovery responses. 7/6/2022 4.00 230.00 92 isted with discovery responses.
isted with discovery responses.
isted with discovery responses.
ndsay Cellars 7/7/2022 4.00 230.00 92
•
isted with discovery responses.
ndsay Cellars 7/8/2022 3.00 230.00 69
isted with discovery responses.
Professional Fees 17.50 4,26

Smart. Focused. Done Right.

ScottMadden, Inc. 2626 Glenwood Avenue Suite 480 Raleigh, NC 27608 919-781-4191 scottmadden.com

August 26, 2022 Invoice Number: 021470

PO Number: P91-2210-100186

Accounts Payable Water Service Corporation of Kentucky 500 W. Monroe Street Suite 3600 Chicago, IL 60661

In Reference To: Professional services provided in July 2022 for project 197-004

WSK Wage and Benefit Study

	Amount		
Professional Fees	\$	3,025.00	
Total Fees and Expenses	\$	3,025.00	
Total Due	\$	3,025.00	

If you have any questions regarding this invoice, please let me know. Please remit payment in U.S. funds to: ScottMadden, PO Box 935955, Atlanta, GA 31193-5955. Thank you for retaining ScottMadden.

Sincerely,

Dylan D'Ascendis

Partner

ScottMadden, Inc.

Tax ID:

Project WSK Wage and Benefit Study

In Reference to: Professional services provided in July 2022 for project 197-004

Professional Fees		Current <u>Hours</u>	Rate	Current <u>Amount</u>				
Quentin Watkins	7/20/2022	3.00	270.00	810.00				
Drafted response to AG data request Quentin Watkins	7/21/2022	2.00	270.00	540.00				
Drafted response to AG data request Quentin Watkins	7/26/2022	2.00	270.00	540.00				
Responded to client questions and revised D Quentin Watkins	R responses 7/27/2022	3.00	270.00	810.00				
Responded to client questions and revised DR responses Dylan D'Ascendis 7/27/2022 1.00 325.00 325.00								
Benchmarking discovery request								
Profess	ional Fees	11.00		3,025.00				



Allen Wilt

Corix Regulated Utilities

Allen Wilt

Water Service Corp of, KY

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.

INVOICE OF SERVICES

Invoice Date: 07/06/2022 Invoice No: 159369 Account No: 64592.0012

Hours

2022 WSCK Rate Case

PO# P91-2210-100171

06/01/2022	МТО	Review motion to intervene by OAG; draft email to team regarding same.	0.20
06/02/2022	RCP	Draft/revise confidentiality agreement for WSCK rate case to be used with the KYOAG	1.10
06/07/2022	МТО	Communicate (with client) with J. Kilbane regarding expected rate case procedure.	0.20
06/09/2022	МТО	Review public comments that have been filed in case.	0.20
	МТО	Communicate (with client) - draft email to client regarding AG's request for confidential information.	0.10
	МТО	Review and revise confidentiality agreement.	0.30
	МНР	Review of public complaints filed with the Public Service Commission and create spreadsheet with relevant information to case	1.10
	МТО	Communicate (with client) - draft email to WSCK team regarding public comments	0.20
06/13/2022	МНР	Prepare responses to STAFF's first request for information to Water Service Corporation of Kentucky for distribution to client	2.70
	MHP	Review of public complaints filed with the Public Service Commission and create spreadsheet with relevant information to case	0.40
	МТО	Review RFI issued by Commission Staff; draft email to team regarding same.	0.40
06/14/2022	МТО	Draft/revise notice of filing for public notice; communicate with WSCK team regarding same	0.80
06/15/2022	МТО	Review confidentiality agreement sent by OAG; draft email to A. Goad regarding same	0.20

Page. 2 07/06/2022 Account No. 64592-0012M Invoice No. 159369

2022 WSCK Rate Case PO# P91-2210-100171

			Hours
	МТО	Review order approving OAG intervention; draft email to client.	0.10
	МТО	Communicate (with client) with S. Whitney regarding rate case	0.20
	МТО	Review no-deficiency letter; draft email to client regarding same	0.10
	МТО	Review order granting OAG intervention; draft email to client regarding same.	0.10
06/16/2022	MHP	Review of public complaints filed with the Public Service Commission and create spreadsheet with relevant information to case	0.30
	МТО	Review and respond to J. Kilbane regarding certain request for information	0.20
06/21/2022	МТО	Communicate (with client) - draft email to WSCK team regarding rate case requirements	0.20
	МТО	Communicate (with client) - draft email to J. Kilbane regarding data requests generally	0.20
	MHP	Review of public complaints filed with the Public Service Commission and create spreadsheet with relevant information to case	0.20
	МТО	Communicate (with client) - review and respond to J. Kilbane regarding specific data request and information to be produced.	0.30
06/22/2022	МТО	Appear for/attend meeting with J. Kilbane and team to discuss responses to data requests	0.70
06/23/2022	МТО	Review and respond to email question from J. Kilbane regarding specific data request	0.30
	МТО	Review procedural order from PSC; draft email to client regarding same; review and respond to email from K. Pashos.	0.60
06/24/2022	RCP	Communicate (with client) attend meeting regarding data responses in rate case and petition for confidential treatment	0.70
	RCP	Draft/revise prepare certification for J. Kilbane to complete with response to Data Request	0.50
06/27/2022	МТО	Appear for/attend meeting with WSCK team regarding data requests	0.70

Page. 3 07/06/2022 Account No. 64592-0012M Invoice No. 159369

10.00

10.00

2022 WSCK Rate Case PO# P91-2210-100171

05/13/2022

existence

(509) Filing/Processing Fees

	MUD	Decree Decree to OTAFF First Date Decree	-4- b	Hours	:	
	MHP	Prepare Responses to STAFFs First Data Reque converting, adding headers, labeling attachments combining documents in preperation for filing		1.20		
	МТО	Review documents and revise responses to data	requests	1.60	i	
	RCP	Communicate (with client) attend meeting with W regarding Data Request answers and filing	SCK	0.80	ı.	
	RCP	Draft/revise petition for confidential treatment of DR Responses	Data	3.60		
06/28/2022	MHP	Prepare Responses to STAFFs First Data Reque converting, adding headers, labeling attachments combining documents in preperation for filing	-	6.00	ı.	
	МТО	Review materials related to PSC DR1; revise respective petition for confidential treatment; commun WSCK team regarding same.		5.30	ı	
	RCP	Draft/revise edit DR1 responses		3.50	•	
	RCP	Draft/revise petition for confidential treatment for	DR1	1.30	·	
06/29/2022	МНР	Prepare Responses to STAFFs First Data Reque converting, adding headers, labeling attachments combining documents in preperation for filing		0.80	ı	
	МТО	Review Clinton's Motion to Intervene; communicategarding same.	te with clie	ent 0.60	ł	
	МТО	Communicate (with client) - phone call with S. Whregarding rate case	nitney	0.50	i.	
	МТО	Draft/revise - coordinate with Staff regarding filing Excel file; draft email to OAG regarding same.	of large	0.30	i.	
	RCP	Review motion to intervene from City of Clinton		0.20	<u> </u>	
		For Current Services Rendered		39.00	7,561.50	
-		Recapitulation			-	
<u>Timekeeper</u> M. Todd Osterloh Rebecca C. Price Michael H. Peyton		<u>Title</u> Member	<u>Hours</u> 14.60	Hourly Rate \$275.00	<u>Total</u> \$4,015.00	
		Associate	11.70	200.00	2,340.00	
		Paralegal	12.70	95.00	1,206.50	
Costs						

(509) Court fees (10.005) Central Bank & Trust Co. - certificate of

	CK Rate Case 2210-100171				Account No. Invoice No.	64592-0012M 159369
05/24/2022	(543) Online re (543) Westlaw		Thomson Reuter - W	/estLaw Researd	ch	17.84 17.84
Total Costs Thru 06/30/2022						27.84
Total Current Work Previous Balance						7,589.34
						\$9,090.40
Balance Due					\$16,679.74	
			Past Due Amounts			
	Stmt Date 06/06/2022	Stmt # 158689		Billed 9,090.40	<u>Due</u> 9,090.40	

Corix Regulated Utilities

Page. 4 07/06/2022

9,090.40