

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Electronic Application of Water Service )  
Corporation of Kentucky for a General ) Case No. 2022-00147  
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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**WATER SERVICE CORPORATION OF KENTUCKY'S  
REQUEST FOR INFORMATION TO THE ATTORNEY GENERAL**

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Water Service Corporation of Kentucky (“WSCK”), by counsel, propound the following data requests upon the Office of Attorney General (“OAG”). OAG shall respond to these requests in accordance with the provisions of the Commission’s August 5, 2022, Order, applicable regulations, and the instructions set forth below.

**INSTRUCTIONS**

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate WSCK’s request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for WSCK.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much

information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

7. If OAG objects to any request on any grounds, please notify counsel for WSCK as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

RESPECTFULLY SUBMITTED,

STURGILL, TURNER, BARKER & MOLONEY, PLLC



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## Requests for Information

1. Please provide the electronic workpapers and source documents that support Exhibits RAB-2 through RAB-4 in Excel format with all formulae intact. (WSCK notes that some or all of these electronic workpapers have already been provided by the Attorney General to WSCK.)
2. Please provide the Value Line Investment Analyzer (September 29, 2022) Excel workpaper that supports Mr. Baudino's Value Line Market Return Data on RAB-4
3. Please provide any cited materials within the body of Mr. Baudino's direct testimony. If the cited item is an article, please provide the entire article. If it is a cite from a textbook, please provide the relevant section from that textbook.
4. On page 29 of Mr. Futral's testimony, he identifies an account called "the liability bad debt reserve balance." Please confirm that this referenced account is the same as NARUC Account 143 – Accumulated Provision for Uncollectible Accounts.
5. Citing page 16 of Mr. Futral's testimony, does his recommended revenue requirement adjustment to remove the AMI project include an offset allowing for replacements of meters in the normal course during the Forecast Period with equipment noted in response to AG DR 1-12?
6. Has Mr. Futral ever conducted a utility Total Compensation Study, such as the one supplied by Mr. Watkins with WSCK's application? If so, please provide a list of all dockets for which such a study was supplied, noting the subject utility, state or states (and cities/regions if applicable) used to represent the "market", what market data sources were used, and a summary of the results and any recommendations.
7. On page 42 of Mr. Futral's testimony, he states, regarding positions currently held outside of Kentucky, "Base wage comparisons made for employees in Chicago, IL and Cleveland, OH would certainly be higher than if the comparisons were made to market positions within the Company's Kentucky service territories." Please supply all data used to make this conclusion, including studies, articles, research papers, publications, or other publicly available information.
8. On page 51 of Mr. Futral's testimony, he states that the Bureau of Labor Statistics' 2021 averages for single and family company-paid health insurance premium coverages are 78% and 66%, respectively. Please supply documentation supporting these figures, identifying the industry and region these figures represent.