

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

|                                       |   |            |
|---------------------------------------|---|------------|
| ALTERNATIVE RATE ADJUSTMENT FILING OF | ) | CASE NO.   |
| GREEN-TAYLOR WATER DISTRICT           | ) | 2022-00246 |

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RESPONSE OF GREEN-TAYLOR WATER DISTRICT  
TO THE COMMISSION STAFF'S FOURTH REQUEST FOR  
INFORMATION DATED DECEMBER 13, 2022



**Green-Taylor Water District**  
**Case No. 2022-00246**  
**Commission Staff's Fourth Request for Information**

**Witness:** Mary Ann Larimore

1. Refer to Green-Taylor District's response to Commission Staff's First Request for Information (Staff's First Request), Item 3.a., Excel Workbook: GT1\_3.a-Adjustments.xlsx.

a. Green-Taylor District reported that it purchased 199,711,000 gallons of water from the city of Greensburg (Greensburg) in the calendar year 2021. Provide legible copies of the Greensburg purchased water invoices received by Green-Taylor District for the period of November 1, 2020 through February 28, 2022.

**Response:** See file GT4 1.a-Greensburg Invoices

b. Green-Taylor District reported that it purchased 32,022,770 gallons of water from the Green River Valley Water District (Green River District) in the calendar year 2021. Provide legible copies of the Green River District purchased water invoices received by Green-Taylor District for the period of November 1, 2020 through February 28, 2022.

**Response:** See file GT4 1.b-GRV Invoices

c. Green-Taylor District reported that it purchased 138,349,000 gallons of water from the city of Campbellsville (Campbellsville) in the calendar year 2021. Provide legible copies of the Campbellsville purchased water invoices received by Green-Taylor District for the period of November 1, 2020 through February 28, 2022.

**Response:** See file GT4 1.c-Campbellsville Invoices

2. Refer to Green-Taylor District's response to Staff's First Request, Item 8.

a. Explain what is included in the Service Charge's 2,106 occurrences.

**Response:** If the customer does not read their meter for 3 months, a service man goes out and reads the meter. This occurred 2,106 times in 2021.

b. Provide the item included in the Service Charge and the number of occurrences for each item.

**Response:** See Item 2.a above and Item 4 below.

3. Refer to the Commission Staff's Second Request for Information (Staff's

Second Request), Item 2a. and Item 2.b. In its responses, Green-Taylor District stated that it would start the interviews to fill the vacant Operator position the week of November 14, 2022.

a. If the vacant Operator position has been filled, provide the employee information as originally requested in Item 1.a.

**Response:** The vacant position has not been filled at this time.

b. If Green-Taylor District has yet to hire its new Operator, provide the revised date Green-Taylor District expects to fill the vacant Operator position.

**Response:** The date for hiring the new operator has been postponed until the first of 2023.

4. Refer to Green-Taylor District's response to Commission Staff's Second Request, Item 1 and Item 7. Reconcile the revenue stated in Item 1 with the revenue stated in Item 7.

**Response:** The work reported in Item 1 as Service Charges is the same work that was reported in Item 7 and labeled Meter Reread Charges.

a. Explain if the revenue from Item 7 for the Meter Reread Charge is in addition to the revenue in Item 1.

**Response:** This is the same revenue but was reported with two different category names.

b. If the revenue for the Meter Reread Charge is in addition to the revenue stated in Item 1, explain why it isn't included in Item 1.

**Response:** The revenue from Item 7 is not in addition to the revenue in Item 1.

c. Provide the location in the number of occurrences for the Meter Reread Charge in response to Staff's First Request listing of occurrences.

**Response:** The number of occurrences for the Meter Reread Charge was reported as Service Charges in response to Staff's First Request for Information, Item 8.

5. Refer to the PDF named "GT3\_1-Cann\_Tech\_Payment.pdf" filed in Green-Taylor District's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 1.

a. Provide a signed copy of the Agreement on pages 1-3 of the PDF.

**Response:** See file GT4 5.a-Cann Tech Contract

b. Reconcile the check in the amount of \$23,750.20 on page 4 with the amount on page 5 of \$29,249.80. Explain the reason for the discrepancy. Provide a copy of the check in the amount noted on page 5 and the invoice for page 4.

**Response:** The total amount owed to Cann-Tech was \$53,000. The check for \$23,750.20 was money borrowed for the KIA project. The check for \$29,249.80 was paid out of the Operation and Maintenance Account. This was the final invoice for Cann-Tech. See file GT4 5.b-Cann Tech Checks

c. Confirm that Green-Taylor District paid both amounts to satisfy the Agreement on pages 1-3 of the PDF.

**Response:** Yes, Green-Taylor did pay both amounts (total of \$53,000) to satisfy the Settlement Agreement.

d. Confirm that the amounts paid were listed in the accounts payable for the year 2019 and the year 2020. If not, explain how these expenses were shown on the books. If the amount is in excess of what was owed, explain in detail the reason for the settlement amount.

**Response:** The amounts would not appear on the books for 2019 or 2020 because the work had not been done at that time. The total is less than what we would have owed them if they would have completed all of the work. We changed engineers in the middle of the project, so this was the total that was agreed upon between the two parties.

e. Provide copies of the original Cann-Tech invoices as originally requested in Staff's Second Request, Item 1.

**Response:** See file GT4 5.e-Cann Tech Invoices

f. Explain if Green-Taylor District expects to have any other expenses under this contract.

**Response:** Green-Taylor does not expect to have any further expenses under this contract.

g. If so, explain if any of these expenses be capitalized.

**Response:** Not applicable.