

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

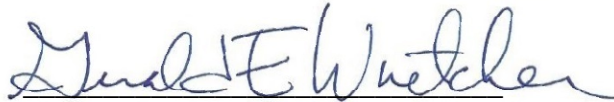
ELECTRONIC APPLICATION OF)	
MOUNTAIN WATER DISTRICT FOR A)	CASE NO. 2022-00366
GENERAL ADJUSTMENT OF WATER)	
RATES)	

**MOUNTAIN WATER DISTRICT'S AMENDED RESPONSE TO
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION**

Mountain Water District amends its Response to Commission Staff Request 3-4. The attached response is substituted for and supersedes the response to Request 3-4 filed with the Commission on July 14, 2023.

Dated: August 15, 2023

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, and the Public Service Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was transmitted to the Public Service Commission on August 15, 2023 and that there is currently no party that the Public Service Commission has excused from participation by electronic means in this proceeding.



Counsel for Mountain Water District

MOUNTAIN WATER DISTRICT

Amended Response to Commission Staff's Third Request for Information Case No. 2022-00366

Question No. 4

Responding Witness: Kevin Lowe/Connie Allen

Q-4. Refer to the Application, Exhibit 9, Usage and Revenue Data.

- a. Provide the usage data by customer classifications.**
- b. Provide the minimum bill data by customer classifications without usage included, this should be the meter charge only.**
- c. Provide the minimum bill data by customer classifications without the meter charge included, this should be the usage data only of the minimum bill.**

A-4. a. See Amended Attachment 3-4. An Excel version of this attachment is embedded in this document and is also filed separately with this response.

- b. Mountain District proposes to assess a customer charge and volumetric rate to every customer, regardless of whether that customer uses any water. In the case in which a customer uses no water, that customer is assessed a monthly water bill consisting of a customer charge and the minimum volume charge in accordance with the size of meter. The charge is mathematical (customer charge + (volume X volume rate per thousand gallons)) with the exception of the residential 5/8-inch x 3/4-inch meter. The residential minimum bill is discounted while still generating sufficient revenue to meet expenses and reserves.

Amended Attachment 3-4 shows the bills and usage for each customer class by meter size. It provides the total number of minimum bills assessed, the number of assessed minimum bills for which no usage was reported, and the total usage for all minimum bills assessed. The first row of each class/meter size group shows the number of bills for which **no water usage was recorded**. The second row of each class/meter size group shows the number of minimum bills for which **some water usage was recorded**. To obtain the total number of minimum bills assessed for a class/meter size group, the number of bills in first two rows of the class/size group must be totaled. The water usage for minimum bills for a class/meter size group is shown in the second row.

- c. See response to Request 3-4b and Amended Attachment 3-4.

**AMENDED ATTACHMENT 3-4
USAGE ANALYSIS**

RESIDENTIAL 3/4-INCH METER						
	BILLS	GALLONS	FIRST 2,000	NEXT 8,000	OVER 10,000	TOTAL
ZERO USAGE BILLS	9,278	-	-	-	-	-
FIRST 2,000 MINIMUM BILL	65,559	73,293,660	73,293,660	-	-	73,293,660
NEXT 8,000 GALLONS	107,785	426,219,270	215,570,000	210,649,270	-	426,219,270
OVER 10,000 GALLONS	4,695	84,456,760	9,390,000	37,560,000	37,506,760	84,456,760
TOTAL	187,317	583,969,690	298,253,660	248,209,270	37,506,760	583,969,690
RESIDENTIAL 1-INCH METER						
	BILLS	GALLONS	FIRST 2,000	NEXT 8,000	OVER 10,000	TOTAL
ZERO USAGE BILLS	10	-	-	-	-	-
FIRST 5,000 MINIMUM BILL	57	142,090	142,090	-	-	142,090
NEXT 5,000 GALLONS	12	78,550	60,000	18,550	-	78,550
OVER 10,000 GALLONS	9	175,090	45,000	45,000	85,090	175,090
TOTAL	88	395,730	247,090	63,550	85,090	395,730
RESIDENTIAL 2-INCH METER						
	BILLS	GALLONS	FIRST 20,000	OVER 20,000		TOTAL
ZERO USAGE BILLS	13	0	0	0		0
FIRST 20,000 MINIMUM BILL	-	0	0	0		0
OVER 20,000 GALLONS	-	0	0	0		0
TOTAL	13	0	0	0		0
COMMERCIAL 3/4-INCH METER						
	BILLS	GALLONS	FIRST 2,000	NEXT 8,000	OVER 10,000	TOTAL
ZERO USAGE BILLS	1,396	0	0	0	0	0
FIRST 2,000 MINIMUM BILL	5,959	4,888,000	4,888,000	0	0	4,888,000
NEXT 8,000 GALLONS	5,234	21,689,010	10,468,000	11,221,010	0	21,689,010
OVER 10,000 GALLONS	537	13,301,650	1,074,000	4,296,000	7,931,650	13,301,650
TOTAL	13,126	39,878,660	16,430,000	15,517,010	7,931,650	39,878,660
COMMERCIAL 1-INCH METER						
	BILLS	GALLONS	FIRST 5,000	NEXT 5,000	OVER 10,000	TOTAL
ZERO USAGE BILLS	80	-	-	-	-	-
FIRST 5,000 MINIMUM BILL	152	295,350	295,350	-	-	295,350
NEXT 5,000 GALLONS	86	665,860	430,000	235,860	-	665,860
OVER 10,000 GALLONS	143	2,744,830	715,000	715,000	1,314,830	2,744,830
TOTAL	461	3,706,040	1,440,350	950,860	1,314,830	3,706,040
COMMERCIAL 2-INCH METER						
	BILLS	GALLONS	FIRST 20,000	OVER 20,000		TOTAL
ZERO USAGE BILLS	55	-	-	-		-
FIRST 20,000 MINIMUM BILL	213	1,857,710	1,857,710	-		1,857,710
OVER 20,000 GALLONS	136	16,822,220	2,720,000	14,102,220		16,822,220
TOTAL	404	18,679,930	4,577,710	14,102,220		18,679,930
COMMERCIAL 3-INCH METER						
	BILLS	GALLONS	FIRST 30,000	OVER 30,000		TOTAL
ZERO USAGE BILLS	11	-	-	-		-
FIRST 30,000 MINIMUM BILL	15	56,230	56,230	-		56,230
OVER 30,000 GALLONS	49	15,681,190	1,470,000	14,211,190		15,681,190
TOTAL	75	15,737,420	1,526,230	14,211,190		15,737,420
COMMERCIAL 4-INCH METER						
	BILLS	GALLONS	FIRST 50,000	OVER 50,000		TOTAL
ZERO USAGE BILLS	-	-	-	-		-
FIRST 50,000 MINIMUM BILL	15	149,800	149,800	-		149,800
OVER 50,000 GALLONS	21	5,486,710	1,050,000	4,436,710		5,486,710
TOTAL	36	5,636,510	1,199,800	4,436,710		5,636,510

**AMENDED ATTACHMENT 3-4
USAGE ANALYSIS**

PUBLIC AUTHORITY 3/4-INCH METER							
	BILLS	GALLONS	FIRST 2,000	NEXT 8,000	OVER 10,000	TOTAL	
ZERO USAGE BILLS	126	-	-	-	-	-	
FIRST 2,000 MINIMUM BILL	678	335,310	335,310	-	-	335,310	
NEXT 8,000 GALLONS	175	722,460	350,000	372,460	-	722,460	
OVER 10,000 GALLONS	23	567,290	46,000	184,000	337,290	567,290	
TOTAL	1,002	1,625,060	731,310	556,460	337,290	1,625,060	
PUBLIC AUTHORITY 1-INCH METER							
	BILLS	GALLONS	FIRST 5,000	NEXT 5,000	OVER 10,000	TOTAL	
ZERO USAGE BILLS	15	-	-	-	-	-	
FIRST 5,000 MINIMUM BILL	69	150,820	150,820	-	-	150,820	
NEXT 5,000 GALLONS	32	227,200	160,000	67,200	-	227,200	
OVER 10,000 GALLONS	35	1,382,950	175,000	175,000	1,032,950	1,382,950	
TOTAL	151	1,760,970	485,820	242,200	1,032,950	1,760,970	
PUBLIC AUTHORITY 2-INCH METER							
	BILLS	GALLONS	FIRST 20,000	OVER 20,000		TOTAL	
ZERO USAGE BILLS	10	-	-	-		-	
FIRST 20,000 MINIMUM BILL	98	584,270	584,270	-		584,270	
OVER 20,000 GALLONS	123	9,223,480	2,460,000	6,763,480		9,223,480	
TOTAL	231	9,807,750	3,044,270	6,763,480		9,807,750	
PUBLIC AUTHORITY 3-INCH METER							
	BILLS	GALLONS	FIRST 30,000	OVER 30,000		TOTAL	
ZERO USAGE BILLS	12	-	-	-		-	
FIRST 30,000 MINIMUM BILL	9	167,010	167,010	-		167,010	
OVER 30,000 GALLONS	15	1,357,250	450,000	907,250		1,357,250	
TOTAL	36	1,524,260	617,010	907,250		1,524,260	
PUBLIC AUTHORITY 4-INCH METER							
	BILLS	GALLONS	FIRST 50,000	OVER 50,000		TOTAL	
ZERO USAGE BILLS	-	-	-	-		-	
FIRST 50,000 MINIMUM BILL	17	350,000	350,000	-		350,000	
OVER 50,000 GALLONS	7	482,000	350,000	132,000		482,000	
TOTAL	24	832,000	700,000	132,000		832,000	
PUBLIC AUTHORITY 6-INCH METER							
	BILLS	GALLONS	FIRST 100,000	OVER 100,000		TOTAL	
ZERO USAGE BILLS	13	-	-	-		-	
FIRST 100,000 MINIMUM BILL	33	1,516,000	1,516,000	-		1,516,000	
OVER 100,000 GALLONS	3	330,000	300,000	30,000		330,000	
TOTAL	49	1,846,000	1,816,000	30,000		1,846,000	
INDUSTRIAL 2-INCH METER							
	BILLS	GALLONS	FIRST 20,000	OVER 20,000		TOTAL	
ZERO USAGE BILLS	-	-	-	-		-	
FIRST 20,000 MINIMUM BILL	12	102,000	102,000	-		102,000	
OVER 20,000 GALLONS	-	-	-	-		-	
TOTAL	12	102,000	102,000	-		102,000	
INDUSTRIAL 4-INCH METER							
	BILLS	GALLONS	FIRST 50,000	OVER 50,000		TOTAL	
ZERO USAGE BILLS	-	-	-	-		-	
FIRST 50,000 MINIMUM BILL	-	-	-	-		-	
OVER 50,000 GALLONS	12	8,139,000	600,000	7,539,000		8,139,000	
TOTAL	12	8,139,000	600,000	7,539,000		8,139,000	
MULTIPLE METERS BILLED AT 3/4-INCH METER							
	BILLS	SERVICES BILLED	GALLONS	FIRST 2,000	NEXT 8,000	OVER 10,000	TOTAL
ZERO USAGE BILLS	118	257	-	-	-	-	-
FIRST 2,000 MINIMUM BILL	341	888	384,020	384,020	-	-	384,020
NEXT 8,000 GALLONS	1,702	3,997	8,728,230	3,404,000	5,324,230	-	8,728,230
OVER 10,000 GALLONS	425	3,850	20,676,720	850,000	3,400,000	16,426,720	20,676,720
TOTAL	2,586	8,992	29,788,970	4,638,020	8,724,230	16,426,720	29,788,970

**AMENDED ATTACHMENT 3-4
USAGE ANALYSIS**

WHOLESALE CUSTOMERS						
	Gallons					
MARTIN COUNTY WATER DISTRICT	127,600					
MINGO COUNTY PUBLIC SERVICE DISTRICT	2,216,900					
NOLIN PUBLIC SERVICE DISTRICT	-					
ELKHORN CITY	55,526,900					
TOTAL	57,871,400					
Mountain Water District Usage						
*NOT BILLED	BILLS	GALLONS	FIRST 2,000	NEXT 8,000	OVER 10,000	TOTAL
ZERO USAGE BILLS	131	0	0	0	0	0
FIRST 2,000 MINIMUM BILL	103	55,870	55,870	0	0	55,870
NEXT 8,000 GALLONS	12	43,310	24,000	19,310	0	43,310
OVER 10,000 GALLONS	49	2,664,390	98,000	392,000	2,174,390	2,664,390
TOTAL	295	2,763,570	177,870	411,310	2,174,390	2,763,570

*MWD Usage is for tracking purposes only; it is not billed

**First Usage Block for each customer class does not include bills for which no usage was recorded for the billing period; for total number of bills assessed a minimum bill, add zero usage block and First Usage Block (Minimum Bill)