

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

In the Matter of:

ELECTRONIC APPLICATION OF GRANT)	CASE NO.
COUNTY SANITARY SEWER DISTRICT FOR AN)	2022-00377
ALTERNATIVE RATE ADJUSTMENT)	

**INTERVENOR CITY OF CRITTENDEN'S SECOND SET OF
REQUESTS FOR INFORMATION**

Comes now the intervenor, the City of Crittenden (Crittenden), and submits its Second Set of Request for Information to Grant County Sanitary Sewer District ("GCSD") to be answered by the date specified in the Commission's Order, and in accord with the following instructions:

(1) Please identify the witness(es) who will be prepared to answer questions concerning each request.

(2) Please repeat the question to which each response is intended to refer. Intervenor can provide counsel for GCSD with an electronic version of these data requests, upon request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if GCSD 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.

(4) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(5) If you believe any request appears confusing, please request clarification directly from Intervenor's counsel.

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

(7) 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.

(8) If GCSD has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Intervenor as soon as possible.

(9) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and

instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

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

(11) In the event any document called for has been destroyed or transferred beyond the control of GCSD, please state: 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.

(12) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(13) Intervenor reserves the right to pose additional preliminary data requests on or before the due date specified in the Commission's procedural schedule.

SECOND SET OF REQUESTS FOR INFORMATION

Request No. 1. Refer to the Application generally to answer the following:

- a. Provide a detailed chart comparing GCSD's current average monthly residential rates to all other privately and publicly owned sanitary sewer utilities average monthly residential rates in Kentucky.
- b. Provide a detailed chart comparing GCSD's proposed average monthly residential rates to all other privately and publicly owned sanitary sewer utilities average monthly residential rates in Kentucky.

Request No. 2. Provide the proof of publication for both the original and corrected rate increase notice that was issued to GCSD customers. Also, provide copies of all other notifications of the rate increase that GCSD sent to the customers via bill inserts, posted on social media, etc.

Request No. 3. Refer to the Application generally and provide, by customer class, the actual usage (volumes and revenues) for the twelve months ending December 31, 2022.

Request No. 4. Refer to the Application, page 6, section 12, in which GCSD states that it provides sanitary sewer services to approximately 1,650 customers. Please state the exact number of listed customers located within the City of Crittenden.

Request No. 5. Produce all communications between GCSD's commissioners, staff, and consultants which concern the rate increase.

Request No. 6. Please provide a copy of all emails, phone records, text messages, and other documents showing communications between or among GCSD commissioners, GCSD employees, your witnesses, and any person not a party to this case regarding, containing the following search terms: “Rate Increase”, “HMB”, “Treatment Plant”, “Expansion”, “Violet Road”, “Bullock Pen Water District”, “Bullock Pen”, “BPWD”, “Crittenden”, “Repairs”, “Chemical Costs”, “Fuel”, and “Power”. This request seeks communications created between 2020 and the filing of this case.

Request No. 7. Refer to the Application, page 6, section 12, in which GCSD states that it provides sanitary sewer services to approximately 1,650 customers. Please state the exact number of listed customers considered to be residential.

Request No. 8. Produce any other supplementary documents dictating the contractual and labor agreements established between GCSD and Bullock Pen Water District. This request does not seek the various management agreements produced in response to the commission staff’s request.

Request No. 9. Produce any conflict-of-interest policy maintained by GCSD in relation to its commissioners and contracts.

Request No. 10. Please produce any invoices or billing documents demonstrating expenses related to the management agreement, labor charges, and contractor services exchanged with Bullock Pen Water District. This request seeks documents created between 2018 and the filing of this case.

Request No. 11. Produce any documents demonstrating the cost of Fuel/Power associated with pumping and treatment. This request seeks documents created between 2018 and the filing of this case.

Request No. 12. Produce all billing and invoice statements exchanged between GCSD and any other utility including but not limited to Owen Electric Cooperative, Inc. This request seeks documents created between 2018 and the filing of this case.

Request No. 12. Provide a chart demonstrating the monthly fuel costs related to GCSD's physical plants and properties. This request seeks information for the period between 2018 and the filing of this case.

Request No. 13. Produce an excel file or PDF document listing the address of all properties who received services from GCSD during the year of 2022.

Request No. 14. Provide the names of the various Bullock Pen Water District personnel who provide services to GCSD pursuant to the relevant management agreements. Additionally, please describe the various services that the individual provides to GCSD.

Request No. 15. Please provide all maintenance records related to upgrades and repairs performed to GCSD's Wastewater Treatment Plant. This request seeks documents created between 2013 and the filing of this case.

Request No. 16. Produce an excel file or PDF document listing the address of all properties who received services from GCSD during the year of 2022 located on Violet Road, Eads Road, Charles Givins Drive, Carla Court, and Beverly Lane.

Request No. 17. Produce all communications, documents, and contracts exchanged between GCSD and HMB Professional Engineering.

Respectfully submitted,

/s/ Brandon N. Voelker

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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that City of Crittenden's February 16, 2023 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on February 16, 2023; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Brandon N. Voelker

Brandon N. Voelker (88076)