

**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 REQUESTS FOR INFORMATION

Comes now the intervenor, the City of Crittenden (Crittenden), and submits its Initial 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.

REQUESTS FOR INFORMATION

1. Reference the GCSD application generally. Provide all tables and exhibits referenced in or supporting the application and testimony in their native electronic format (i.e. Microsoft Word, Microsoft Excel), with data including formulas in all cells and rows fully intact and fully accessible.
 - a. Provide all relevant and supporting worksheets in electronic format with data including formulas in all cells and rows fully intact and fully accessible.
2. Refer to the Application generally to answer the following:
 - a. Provide a detailed comparison between GCSD's current average monthly rates for all customer classes, and the national average monthly rates for all customer classes.
 - b. Provide a detailed comparison between GCSD's proposed average monthly rates for all customer classes, and the national average monthly rates for all customer classes.
 - c. Provide a detailed chart comparing GCSD's current average monthly residential rates to all other privately and publicly owned water utilities average monthly residential rates in Kentucky.
 - d. Provide a detailed chart comparing GCSD's proposed average monthly residential rates to all other privately and publicly owned water utilities average monthly residential rates in Kentucky.

3. Refer to the Application generally and provide, by customer class, the total anticipated Base Period usage (volumes and revenues) and the actual usage (volumes and revenues) for the eleven months ending December 31, 2023.
4. Refer to the GCSD application generally. Provide all invoices from outside experts, consultants, and legal counsel related to the current rate case, as well as the total amount expended thus far. Provide this information on an ongoing basis.
5. Provide an organizational chart of GCSD.
6. Pursuant to 807 KAR 5:001, Section 17(3), provide the proof of publication for both the original and corrected rate increase notice that was issued to Water Service Kentucky customers. Also, provide copies of all other notifications of the rate increase that Water Service Kentucky sent to the customers via bill inserts, posted on social media, etc.
7. Refer to Page 16 of GCSD's Application. Please produce any and all receipts related to the purchase of chemicals by GCSD between 2018 and 2023.
8. Provide the underlying assumptions and calculations demonstrating GCSD's forecasted expenses related to chemicals. Include all supporting calculations in excel (if available). If this information has been provided previously, identify the specific page references where such information can be found.
9. Please provide any reports from GCSD employees, outside experts, or consultants regarding the determination that GCSD has a "static base" resulting in the need to seek a rate increase.
10. Admit whether Section IV (D) of Grant County Fiscal Court Ordinance 01-2008-613 states:

"The owner of any house, building, or property used for human occupancy, employment, recreation, or other purposes under the jurisdiction of this chapter and abutting on any street, alley, or rights-of-way in which there is or may be located a wastewater sewer connected to the treatment facility of the district, is required at the owner's expense to install suitable toilet facilities therein and to connect facilities directly to the proper sewer in accordance with the provisions of this

chapter, within 60 days after date of official notice to do so provided the proper wastewater sewer is within 300 feet of any house, building or property used for human occupancy, employment, recreation, or other purpose. This section shall not apply to any person served by a privately constructed, owned, operated, or maintained wastewater sewer and wastewater treatment facility that discharges directly to a natural outlet in accordance with the provisions of this chapter and applicable state and federal laws.

For purposes of calculating 300 feet as indicated in this section, distance will be measured in a straight line from the nearest practical connection point with an existing sewer line to that point of the owner's occupied structure where sewerage is currently discharged from that structure to an existing septic or other sewer treatment facility. All determinations requiring an owner to tap in to the district's system shall be made by the owner to the district no later than 30 days following the district's notification to the owner requiring owner's tap in to the district's system.

The manager of the district may exempt the owner from the tap in requirements of this section if such tap in would be impractical due to topographical or other engineering considerations.”

11. Please state the number of properties determined to be exempted from Section IV (D) of Grant County Fiscal Court Ordinance 01-2008-613. Please differentiate between commercial and residential properties.
12. Please provide the addresses of all properties determined to be exempted from Section IV (D) of Grant County Fiscal Court Ordinance 01-2008-613.
13. Please provide a detailed explanation regarding why each of the properties exempted pursuant to Section IV (D) of Grant County Fiscal Court Ordinance 01-2008-613 were subject to such an exemption.
14. Please provide the addresses of all properties within GCSD's service area determined to be subject to installation, pursuant to Section IV (D) of Grant County Fiscal Court Ordinance 01-2008-613, that have not been provided official notice regarding their requirement to be connected to the sewer. For purposes of this specific request, the request does not seek information related to properties deemed to be exempt.

15. Refer to Page 16 of GCSD's Application. Please produce any and all receipts related to the purchase of fuel by GCSD between 2018 and 2023. Please differentiate between fuel used for heavy equipment, semi-trucks, and passenger vehicles.
16. Provide the underlying assumptions and calculations demonstrating GCSD's forecasted expenses related to fuel. Include all supporting calculations in excel (if available). If this information has been provided previously, identify the specific page references where such information can be found.
17. Refer to Page 16 of GCSD's Application. Please provide any reports from GCSD employees, outside experts, or consultants regarding the need to conduct repairs/expansion projects to GCSD's waste treatment plant.
18. Refer to Page 16 of GCSD's Application. Please provide any reports from GCSD employees, outside experts, or consultants regarding the costs related to potential repairs/expansion projects to GCSD's waste treatment plant.
19. Refer to Page 16 of GCSD's Application. Please provide any communications or documents maintained by GCSD pertaining to potential repairs/expansion projects to GCSD's waste treatment plant.
20. Provide a detailed description of GCSD's relationship with the City of Crittenden. Ensure to include whether GCSD has a physical office in the city for customers to call for assistance, come in to pay their bill, etc.
21. Explain in detail whether GCSD provides annual reports of any kind to the City of Crittenden. Explain why or why not.

22. Refer to the Application, page 6, section 12, in which GCSD states that it provides water service to approximately 1,650 customers. Please state the number of listed customers located within the City of Crittenden.
23. Refer to the Application, page 6, section 12, in which GCSD states that it provides water service to approximately 1,650 customers. Please state the number of listed customers considered to be residential.
24. Provide copies of any and all documents, agendas, meeting notices, and/or annual reports relating to or distributed at any and all meetings with customers between 1/1/2015 and the present time, which address or otherwise discuss the need for a rate adjustment.
25. Provide copies of any and all documents, correspondences, newsletters, and/or annual reports mailed or provided electronically to GCSD's customers from 1/1/2015 up to the present time, which address or otherwise discuss the need for a rate adjustment.
26. Provide the number of miles of pipeline that GCSD has replaced in the past five calendar years. Ensure to include the type of pipeline that was replaced, and whether it was a planned replacement or a replacement based upon a water break, etc.
27. For the period from January 1, 2015, forward, please provide a copy of all correspondence related to this case or to other GCSD' rate changes between (i) GCSD Commissioners (ii) GCSD Employees and (iii) any other entity.
28. Produce all documents, including without limitation correspondence and calculations, in the possession, custody, or control of GCSD that pertain to GCSD' s (or its members', witnesses', consultants' and advisors') analysis regarding the "Billing Analysis" withing GCSD's application.

29. Please provide a copy of all documents showing communications between or among GCSD commissioners, GCSD employees, your witnesses, and any person not a party to this case regarding, arising out of, or related to this case.
30. Refer to the GCSD application generally to answer the following:
 - a. Provide a list of each GCSD salaried employee's job title with salary, overtime if any, percent pay increase for each of the past five years, and also include all benefits, bonuses, awards, etc.
 - b. Provide a list of each GCSD hourly employee's job title with salary, overtime if any, percent pay increase for each of the past five years, and also include all benefits, bonuses, awards, etc.
 - c. Provide a list of each GCSD's officer/commissioner's job title with salary, overtime if any, percent pay increase for each of the past five years, and also include all benefits, bonuses, awards, etc.
31. Provide copies of all studies that GCSD has conducted addressing the impact that the proposed rate design will have on the elderly, low income, fixed income and home bound segments of its ratepayer base. Provide detailed information for each specified group.
32. Provide the general wage and salary increases that have been given, or will be given, to all GCSD employees for each year between 2018 – 2023.
33. Provide a job description for each new position added since GCSD's last water base rate case.
34. For each of the past GCSD rate case filings, provide:
 - a. filing date,
 - b. test year,
 - c. the amount of the increase requested,

- d. the percentage increase requested,
 - e. the amount and percentage of increase granted,
 - f. the average residential bill amount before and after the rate increase,
 - g. the average residential percentage bill increase,
 - h. whether the case was litigated or settled,
 - i. the total rate case costs incurred, and
 - j. the effective date of new rates.
35. Provide a copy of all contracts with consultants or other third parties for rate case services claimed in this filing.
36. Provide copies of all Requests for Proposal issued by or on behalf of GCSD with regard to the provision of rate case services in this case.
37. Identify any plant held for future use included in GCSD's rate base. For each such plant asset, include:
- a. the date that the asset was acquired,
 - b. a description of the asset and its eventual use,
 - c. the date by which the asset is expected to be put into service, and
 - d. a description of any current activities relating to preparing the asset to enter utility service.
38. Provide a five-year history of gains and losses of asset dispositions and state how such gains/losses are reflected for ratemaking purposes.
39. For each of the past ten years, provide the capital expenditures approved by the GCSD officers/commissioners and the actual capital expenditures. Provide this information separately by:
- a. normal recurring construction,

- b. construction projects funded by others, and
- c. major investment projects.

Respectfully submitted,

/s/ Brandon N. Voelker

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Counsel for Intervening Party

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served this 26th day of January, 2023, via regular and/or electronic mail upon the following:

Grant County Sanitary Sewer District
One Farrell Drive
P.O. Box 460
Crittenden, Kentucky 41030

Paul Harp
Bullock Pen Water District
One Farrell Drive
P.O. Box 188
Crittenden, Kentucky 41030

Thomas R. Nienaber
Skees, Wilson & Nienaber, PLLC
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Florence, Kentucky 41024

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/s/ Brandon N. Voelker

Brandon N. Voelker (88076)