

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

**In the Matter of:  
ELECTRONIC APPLICATION OF  
GRANT COUNTY SANITARY SEWER DISTRICT)  
FOR AN ALTERNATIVE RATE ADJUSTMENT)**

**CASE NO. 2022-00377**

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**RESPONSE OF GRANT COUNTY SANITARY SEWER DISTRICT TO  
CITY OF CRITTENDEN REQUEST FOR INFORMATION**

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Comes now the Grant County Sanitary Sewer District (“GCSD”) and submits the following Response to the City of Crittenden (“Crittenden”) Request for Information (“Request”).

**REQUEST 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.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

MORRIS & BRESSLER, PSC  
Ms. Debra Dedden  
6900 Houston Rd STE 3  
Florence, KY 41042

**RESPONSE:** The requested information is contained in GCSD’s original Application or contained in GCSD’s Response to Staff’s First Request for Additional Information.

**REQUEST 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.

**RESPONSE:** See attached.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

- 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.

**RESPONSE:** See attached.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

- 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.

**RESPONSE:** GCSD does not provide water service. A comparison of GCSD's sanitary sewer rates to water utilities is irrelevant. Also see attached Kentucky Water & Sewer Utility Survey 2022.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

- 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.

**RESPONSE:** GCSD does not provide water service. A comparison of GCSD's sanitary sewer rates to water utilities is irrelevant.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** See attached.

MORRIS & BRESSLER, PSC  
Ms. Debra Dedden  
6900 Houston Rd STE 3  
Florence, KY 41042

**REQUEST 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.

**RESPONSE:** GCSD has not specifically engaged any outside experts, consultants, or legal counsel relating to the current rate case. GCSD's accountants, Morris & Bressler, and Skees, Wilson & Nienaber, PLLC, are providing assistance under their normal services agreement. To date, Morris & Bressler has charged \$6,706.25. Skees, Wilson & Nienaber, PLLC, has charged \$3,335.00. Also, see attached.

MORRIS & BRESSLER, PSC  
Ms. Debra Dedden  
6900 Houston Rd STE 3  
Florence, KY 41042

SKEES, WILSON & NIENABER, PLLC  
Mr. Thomas R. Nienaber  
7699 Ewing Blvd., PO Box 756  
Florence, KY 41022-0756

**REQUEST 5:** Provide an organizational chart of GCSD.

**RESPONSE:** See attached.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** The District has not provided any notices to Water Service Kentucky customers as the District does not have any such customers.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** See attached.

MORRIS & BRESSLER, PSC  
Ms. Debra Dedden  
6900 Houston Rd STE 3  
Florence, KY 41042



**REQUEST 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.

**RESPONSE:** MORRIS & BRESSLER, PSC  
Ms. Debra Dedden  
6900 Houston Rd STE 3  
Florence, KY 41042

**REQUEST 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.

**RESPONSE:** The number of new District customers from 2018 through present has been very limited. As a result, the District’s customer base has not grown to any significant level. While the customer base has remained static, the District’s expenses and costs related to operation, maintenance, etc., have increased.

<b>Time Period</b>	<b>No. of Customers</b>
January 1, 2021 through December 31, 2021	1,650 Customers
January 1, 2020 through December 31, 2020	1,616 Customers
January 1, 2019 through December 31, 2019	1,601 Customers
January 1, 2018 through December 31, 2018	1,577 Customers

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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."

**RESPONSE:** No, the statement made is incorrect, Section IV (D) of Grant County Fiscal Court Ordinance 01- 2008-613 states exactly the following:

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 manager whose decision shall be final. Any appeal from the manager's determination 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.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** On April 22, 2004, the City of Crittenden (“Crittenden”) and the District entered into an Agreement whereby Crittenden transferred its then existing sanitary sewer system to the District. A copy of that Agreement is attached. At that time, there was one known residential property exempted from the Grant County Fiscal Court Ordinance No. 01-2008-613 (“Ordinance”, attached) located on U.S. Highway 25 Crittenden, Kentucky. That residential property was apparently exempted from tapping into Crittenden’s sanitary sewer system due to topographical and other engineering considerations. The District had no role in exempting that property.

During September/October, 2022, the District was contacted by Mayor James Purcell regarding three residential properties located on Violet Road, Crittenden, Kentucky. It was the opinion of Mayor Purcell that the District should require those three residential properties to tap into the District’s sanitary sewer system pursuant to the Ordinance. It was the opinion of the District that the three residential properties were exempt from the Ordinance due to topographical issues and pursuant to the very language contained in the Ordinance. The controversy continued for several weeks. On November 10, 2022, counsel for the District sent a letter to Mayor Purcell outlining the District’s position (attached). This letter specifically explains why the Ordinance does not require the three residences on Violet Road, Crittenden, Kentucky, to tap into the District’s sanitary sewer system pursuant to the Ordinance. In that letter, the District requested Crittenden and Mayor Purcell to attend a District meeting to discuss this issue. No response was ever received from Crittenden and/or Mayor Purcell. These are the only three (3) properties known to the District which have been exempted since the District acquired management and control of Crittenden’s sanitary sewer system.

To the knowledge of GCSD, there are no exempted commercial properties within its system.

There is a residential property located at 265 Turner Drive, Crittenden, KY, 41030. This property is in a very unique topographical position which would require tapping into the District’s sanitary sewer system to be impractical and extremely expensive. See Response to Request No. 13 below.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:**

1. 265 Turner Drive, Crittenden, KY 41030
2. U.S. Highway 25, Crittenden, KY 41030
3. Three residences, Violet Road, Crittenden, KY 41030



Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** See attached November 10, 2022 correspondence from Skees, Wilson & Nienaber to City of Crittenden, Attention: Mayor James L. Purcell (See Response to Request #11).

As to 265 Turner Drive, Crittenden, KY 41030, the residential property was exempted due to extreme topographical issues. In order for the property to tap-in to the District's system, an on-site low pressure grinder pump would need to be installed due to elevation differences. The operational cost and expense and installation cost and expense would be prohibitive.

The U.S. 25, Crittenden, Kentucky property was exempted by the City of Crittenden prior to GCSD's taking over the system. The reasons for that exemption are unknown.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** None.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** See attached.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** See attached.

MORRIS & BRESSLER, PSC  
Ms. Debra Dedden  
6900 Houston Rd STE 3  
Florence, KY 41042

**REQUEST 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.

**RESPONSE:** The District is currently in the process of conducting a facilities plan and eventually hopes to complete a treatment plant expansion project. We have done work with HMB Professional Engineering and their reports are attached.

In 2021 and 2022, GCSD undertook an engineering project to determine if the District's sanitary sewer treatment capacity could be increased through the improvement and installation of Equalization Tanks. That project was discontinued due to construction bids received. A copy of the Equalization Tank Project Engineering Plans and Specifications is attached.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

Mr. Benton Hanson  
HMB PROFESSIONAL ENGINEERS, INC.

**REQUEST 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.

**RESPONSE:** The District is currently in the process of conducting a Facilities Plan. This Plan should be completed in the next 60 days. This Plan (among other purposes) is to provide plans for a treatment plant expansion project. We have done work with HMB Professional Engineering and their reports are attached. See also Response to Request No. 17.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

Mr. Benton Hanson  
HMB Professional Engineers, Inc.

**REQUEST 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.

**RESPONSE:** See attached. See also Response to Request Nos. 17 and 18.

Mr. Paul Harp, Superintendent  
HMB Professional Engineers, Inc.

**REQUEST 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.

**RESPONSE:** There is no direct relationship between the District and the City of Crittenden. The District does have office space located within the City of Crittenden. That office space is leased from the Bullock Pen Water District. The District’s office is open Monday through Friday during normal business hours, where customers may call for assistance, pay bills, and generally make any inquiries. The District’s contact information is: 1 Farrell Dr, Crittenden, KY 41030, Office Phone: (859) 428-3060, Emergency Phone: (859) 428-1235, Fax: (859) 428-1293, Email: [Bullockpen@bpwd.org](mailto:Bullockpen@bpwd.org). Website: [www.gc-ssd.org](http://www.gc-ssd.org).

The current relationship between the District and the City of Crittenden has deteriorated significantly in the last few years.

By way of historical perspective, GCSD would state the following. During or about 2004, the City of Crittenden owned, operated and managed a “City” sanitary sewer system servicing residents within the City of Crittenden political boundaries. During or about 2004/2005, the City of Crittenden contacted the Grant County Fiscal Court (“Fiscal Court”) to determine if the Fiscal Court would take over the operation and maintenance of the City of Crittenden sewer system. The Fiscal Court made the decision to remove the sanitary sewer system from the control of the City of Crittenden and create a new entity known as “Grant County Sanitary Sewer District”. By Ordinance No. 2002-453, the Grant County Sanitary Sewer District was created. On April 22, 2004, the City of Crittenden and GCSD entered into an Agreement (attached, see Response to Request #11), whereby GCSD “purchased from the City of Crittenden the entire sanitary sewer system. At the time of that purchase, the City of Crittenden made various representations and warranties completely set out in the Agreement. Those representations and warranties provided the following:

- (a) Crittenden represents and warrants that the sanitary sewer transmission, collection, treatment and processing systems being transferred to the District and all Assets identified on Schedule A are in a reasonable state of repair and that there are no known defects or deficiencies with respect to any of the equipment, systems, Assets or other property being transferred to District by Crittenden.
- (b) Crittenden is not in default with respect to any term, condition or covenant of any outstanding debt agreement or with respect to any other contract which it may have with any third party concerning the Assets being transferred herein or the Debt

instrument being assumed by the District.

- (c) Execution of this Agreement by Crittenden does not violate any term, condition or covenant of any agreement with any other entity, institution, law or regulation.
- (d) Crittenden has operated its sanitary sewer treatment plant and all Assets in full and complete compliance with all federal, state and local rules, regulations and laws concerning the transmission, collection, treatment and processing of sewage.
- (e) Crittenden is not subject to any litigation or any adverse action by any federal, state or local governmental agency relative to any violation of any federal, state or local rule, law or regulation concerning the collection, transmission, treatment and processing of sewage.
- (f) Crittenden's books and records regarding the operation of its sanitary sewer system and all Debt and Assets are complete, accurate and have been maintained in a reasonable manner so as to accurately reflect the current financial condition and state of affairs of the sanitary sewer system.
- (g) Crittenden does not have any employees or any independent contractors under contract with the City of Crittenden regarding the operation of its sanitary sewer system except Mr. Carl Crone who has an annual contract as an independent contractor, a copy of that contract being attached hereto and identified as Schedule D.
- (h) Crittenden does not have any outstanding accounts payable other than the Debt instrument identified in Schedule C and those debts which are necessarily incurred by Crittenden in the day-to-day operation of its sanitary sewer system.
- (I) Crittenden has maintained all customer billing records consistent with generally accepted accounting principles and that all books and records regarding customer billings and Crittenden's sanitary sewer system accurately reflect the true state of its customer and financial affairs.
- (j) Crittenden is not under contract with any entity or individual for the purpose of providing materials, supplies or other equipment for use by Crittenden in the operation of its sanitary sewer system.
- (k) That the real estate to be transferred herein to the District is free, clear and unencumbered.
- (l) That Crittenden's customer deposit accounts with a current balance of approximately \$55,000.00 accurately reflects those customer deposits on account with Crittenden.

- (m) Crittenden does not owe any accrued employ benefits, including but not limited to pension contributions, unpaid insurance premiums, accrued vacation time, and the like for any employee performing or conducting any work relative to Crittenden' s operation of its sanitary sewer system.
- (n) There are no pending or threatened claims by any individual or other entity regarding any products liability or other civil action or claims and/or damages by any individual or entity arising by, from or through Crittenden's operation and maintenance of its sanitary sewer system.

Immediately after assuming control and management of the sanitary sewer system, the District began incurring significant and substantial problems with the system. Moreover, the District soon learned that the sewer rates established by the City of Crittenden were grossly understated and were not sufficient to provide for the daily maintenance and operation of the sanitary sewer system. As a result, the District initiated a rate increase case with the Public Service Commission captioned:

“APPLICATION OF THE GRANT COUNTY SANITARY SEWER DISTRICT FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY - INITIAL OPERATIONS WITH TARIFF, PUBLIC SERVICE COMMISSION CASE NO. 2005-00314”.

See hyperlink to Case #2005-00314:

<https://psc.ky.gov/Case/ViewCaseFilings/2005-00314>

As a part of that rate increase application, the District provided a summary of the then current conditions of the sanitary sewer system that was transferred to the District. A copy of the summary of those conditions is included in the attached hyperlink. Briefly stated, the sanitary sewer system was in a significant state of disrepair. Sufficient operational funds and revenues were not available for the District to provide sanitary sewer service. During the first few months of the District’s operation of the sanitary sewer system, the Fiscal Court provided funding for the District without which, the District could not have existed. As a direct result of the numerous misrepresentations of the City of Crittenden regarding the condition of the sanitary sewer system, the District incurred thousands of dollars in repair costs which the City of Crittenden refused to reimburse. Needless to say, these material misrepresentations regarding the sanitary sewer system strained the relationship with the District.

Over time, the relationship with the City of Crittenden had improved. In fact, the District provided assistance to the City of Crittenden on an emergency basis if the City of Crittenden was in a bind. For example, the District agreed to provide billing services for the City of Crittenden trash collection at a minimal cost. The District also provided emergency field services to the City of Crittenden. That service has continued through the present, however, the District is currently reevaluating its position in that regard.

In the summer of 2021, there were reports that potential federal funding (“ARPA”) would



become available through cities and counties to be used for water and/or wastewater treatment projects. The District contacted the City of Crittenden to see if any of the funds distributed to the City of Crittenden would be available for District purposes. Specifically, the District was considering the expansion of its wastewater treatment plant as it had reached maximum treatment capacity. After contacting the City of Crittenden, the District was advised that no ARPA funding would be coming from the City of Crittenden to the District for any projects. The City of Crittenden advised the District to simply raise its customer rates to pay for potential expansion and upgrade of the sanitary sewer system. In early 2022, the District was contacted by Mayor Jim Purcell in an effort to seek authority to appoint Commissioners to the District. In addition, the City of Crittenden wanted to know if there was any way the District could avoid Public Service Commission oversight (see attached correspondence dated May 16, 2022 and May 17, 2022 from Mayor Purcell). The District informed the City of Crittenden that the District could not be relieved of Public Service Commission oversight. In addition, the District could not allow the City of Crittenden to appoint Commissioners to the District's Board of Commissioners. This information was sent to the City of Crittenden by the District's legal counsel (see attached).

During this same period, the City of Crittenden through its Mayor, Jim Purcell, began a campaign of making comments that the District was not requiring residents within its service area to tap into then currently available sewer lines. The District requested Mayor Purcell to attend District meetings on more than one occasion. In each instance, Mayor Purcell declined. The City of Crittenden indicated that there were three (3) specific cases where the District was not following the Grant County Sanitary Sewer Ordinance No. 01-2008-613. Those three residences were allegedly located on Violet Road, Crittenden, Kentucky. In response to the allegations from the City of Crittenden, the District's counsel send a letter of explanation dated November 10, 2022 (attached. see Response to Request No. 11), explaining exactly why the three customers identified by the City of Crittenden should not be required to tap into the District's then existing sanitary sewer lines. Again, the District requested the City of Crittenden to attend a District meeting to discuss these issues. Again, the City of Crittenden refused.

Obviously, the relationship between the District and the City of Crittenden has deteriorated significantly. The District has made attempts to meet with the City of Crittenden without success. The City of Crittenden merely insists on making allegations of malfeasance on the part of the District without any justification or basis in fact.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 21:** Explain in detail whether GCSD provides annual reports of any kind to the City of Crittenden. Explain why or why not.

**RESPONSE:** The District does not provide annual reports of any kind directly to the City of Crittenden. There is no requirement under state or local law requiring such a reporting. However, the District submits all of its annual audited financial reports, Division of Water reports, Public Service Commission reports, and the like which are available to the City of Crittenden at any time.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** The District does not provide water service to any customers located within the City of Crittenden, residential or otherwise. Notwithstanding the foregoing, the vast majority of District sanitary sewer customers are located within the City of Crittenden.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** The District does not provide water service to any customers located within the City of Crittenden, residential or otherwise. Notwithstanding the foregoing, the vast majority of District customers are residential.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** There were no formal meeting with customers regarding the present rate increase proceeding. However, there were discussions at meetings of the GCSD during the years 2021 and 2022 which were open to the public. Attached are the Minutes of those meetings (See Response to Request #19). Additionally, GCSD sent notices of the pending rate increase proceeding directly to all customers as indicated in GCSD's original Application filed with the Public Service Commission.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** See attached.

Ms. Ashley Dyer, HR Director  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** See attached.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** In 2019, GCSD filed with the Public Service Commission a Rate Increase Application, Case No. 2019-00424. (Hyperlink: <https://psc.ky.gov/Case/ViewCaseFilings/2019-00424>). As to any correspondence between Commissioners, employees and other entities, there would be no correspondence. There have been significant discussions amongst the Commissioners in its monthly meetings. (See attached Minutes).

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:**

MORRIS & BRESSLER, PSC  
Ms. Debra Dedden  
6900 Houston Rd STE 3  
Florence, KY 41042

**REQUEST 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.

**RESPONSE:** Other than Minutes of GCSD meetings, there would be no correspondence. See attached..

Ms. Ashley Dyer, HR Director  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** The District does not have any employees. All services provided by the District are completed through a Management Agreement with the Bullock Pen Water District.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

- 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.

**RESPONSE:** The District does not have any employees. All services provided by the District are completed through a Management Agreement with the Bullock Pen Water District.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

Ms. Ashley Dyer, HR Director  
GRANT COUNTY SANITARY SEWER DISTRICT

- 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.

**RESPONSE:** District Chairman Charles Givin, \$1,200.00 per year; Vice-Chairman Robert Worthington, \$1,200.00 per year; Secretary (formerly Leo Saylor and not yet replaced), \$1,200.00 per year; Treasurer, Rodger Bingham, \$1,200.00 per year; Commissioner Greg Powell, \$1,200.00 per year.

All Commission positions receive no additional benefits and have not had any increase in their monthly payment since the District's creation.

Secretary Leo Saylor has submitted his resignation from the Board in January, 2023. As of the answering of this Request for Information, Leo Saylor's position has not been filled on the Board.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

Ms. Ashley Dyer, HR Director  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** No studies have been conducted by GCSD regarding the impact of its proposed rate increase on particularized elements, classes, or segments of the taxpayer base.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

Ms. Ashley Dyer, HR Director  
GRANT COUNTY SANITARY SEWER DISTRICT

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** The District does not have any employees.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 33:** Provide a job description for each new position added since GCSD's last water base rate case.

**RESPONSE:** The District does not have any employees.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** In 2005, GCSD initiated a rate increase proceeding before the Public Service Commission. This case is available for review by the City of Crittenden at <https://psc.ky.gov/Case/ViewCaseFilings/2005-00314>.

In 2019, the City initiated a rate increase proceeding before the Public Service Commission. This case is available for review by the City of Crittenden at <https://psc.ky.gov/Case/ViewCaseFilings/2019-00424>.

All information requested in this No. 34 is outlined in the Rate Application proceedings.

Ms. Dianne Cook, Office Manager  
GRANT COUNTY SANITARY SEWER DISTRICT

Ms. Ashley Dyer, HR Director  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 35:** Provide a copy of all contracts with consultants or other third parties for rate case services claimed in this filing.

**RESPONSE:** There are no specific contracts with consultants or other third parties relating to this rate increase proceeding. However, Morris & Bressler and Skees, Wilson & Nienaber, PLLC, have provided assistance in filing these rate proceedings before the Public Service Commission. Morris & Bressler is charging for services at a rate of \$125.00 per hour. Skees, Wilson & Nienaber, PLLC, is providing legal services at the rate of \$145.00 per hour.

Thomas R. Nienaber, Attorney for GCSD  
SKEES, WILSON & Nienaber, PLLC  
7699 Ewing Blvd., PO Box 756  
Florence, KY 41022-0756

**REQUEST 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.

**RESPONSE:** None exists.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 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.

**RESPONSE:** This request is unclear. Notwithstanding, the District would state that it does not have any treatment plant being held for future use that is not currently being operated by the District to service the District customer's needs.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

**REQUEST 38:** Provide a five-year history of gains and losses of asset dispositions and state how such gains/losses are reflected for rate making purposes.

**RESPONSE:** See attached.

MORRIS & BRESSLER, PSC  
Ms. Debra Dedden  
6900 Houston Rd STE 3  
Florence, KY 41042

**REQUEST 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.

**RESPONSE:** See attached.

Mr. Paul Harp, Superintendent  
GRANT COUNTY SANITARY SEWER DISTRICT

All documents requested are in portable document format (PDF) and are searchable and appropriately book marked and/or Excel format with all formulas, rows, and columns unprotected and fully accessible. The representative of Grant County Sanitary Sewer District responsible for supervising the preparation of this Response on its behalf shall be Chairman Charles Givin. This Response is accompanied by a signed Certificate executed by Chairman Charles Givin under oath certifying that the responses contained herein are true and correct to the best of his knowledge, information and belief formed after a reasonable inquiry.

**CERTIFICATE**

Comes now the Grant County Sanitary Sewer District, by and through its Chairman, Charles Givin and states that the information contained in the attached Response to the Commission's Staff Request for Information is true and accurate to the best of the undersigned's knowledge, information and belief formed after a reasonable inquiry.

Done at Crittenden, Kentucky, this 8<sup>th</sup> day of February, 2023.

Respectfully submitted,

GRANT COUNTY SANITARY SEWER DISTRICT

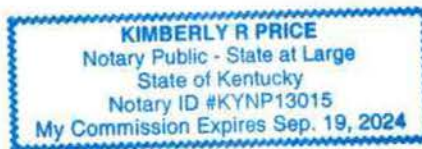
BY: Charles Givin  
CHAIRMAN CHARLES GIVIN

COMMONWEALTH OF KENTUCKY

COUNTY OF GRANT

Subscribed, sworn to and acknowledged before me by Chairman Charles Givin, Grant County Sanitary Sewer District, on this 8<sup>th</sup> day of February, 2023.

Kimberly R Price  
NOTARY PUBLIC, State at Large  
My Commission Expires: \_\_\_\_\_  
Notary ID#: \_\_\_\_\_



**CERTIFICATE**

The undersigned certifies that a copy of the foregoing Response to Crittenden's Request for information was duly emailed to the below described entities this 9<sup>th</sup> day of February, 2023.

Kentucky Attorney General  
Via Email: [rateintervention@ag.ky.gov](mailto:rateintervention@ag.ky.gov)

City of Crittenden  
Via Email: [bvoelker@gatlinvoelker.com](mailto:bvoelker@gatlinvoelker.com)

GRANT COUNTY SANITARY SEWER DISTRICT

BY: *Charles Givin*  
CHAIRMAN CHARLES GIVIN