

**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

**RESPONSE OF GRANT COUNTY SANITARY SEWER DISTRICT TO
PUBLIC SERVICE COMMISSION STAFF REQUEST FOR INFORMATION**

Comes now the Grant County Sanitary Sewer District (“Grant County Sanitary Sewer District”) and submits the following Response to the Public Service Commission (“Commission”) Staff Request for Information (“Request”) as set forth in Appendix “B” of the Commission’s Order entered January 10, 2023.

REQUEST 1: Provide copies of each of the following, and when appropriate, provide in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible:

- a. The general ledger for the calendar years 2021 and 2022; and the trial balance for the calendar years 2021 and 2022.

RESPONSE: See attached.

MORRIS & BRESSLER, PSC
Ms. Debra Dedden
6900 Houston Rd STE 3
Florence, KY 41042¹

- b. Adjusted Trial Balance showing unaudited account balances, audit adjustments, and audited balances for the calendar years 2021 and 2022.

RESPONSE: See attached.

¹Individuals noted under each Response indicates the name of the witness responsible for responding to the questions related to the information provided.

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

- c. Minutes from Grant Sewer District's commissioner meetings for the calendar years 2020, 2021, and 2022.

RESPONSE: See attached.

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

- d. Insurance policies for 2020, 2021 and 2022, if available.

RESPONSE: See attached.

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

- e. Hours worked by each employee for the calendar years 2020, 2021 and 2022.

RESPONSE: See attached.

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

- f. A document listing the names, job titles, job description, and pay rates for each employee during the test year and for those currently employed.

RESPONSE: See attached.

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

- g. A list that describes all employee benefits, other than salaries and wages, paid to, or on behalf of, each employee for each of the previous five years.

RESPONSE: See attached.

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

- h. A document listing the name of all commissioners for each of the five previous years, and state, individually, the total amount of each benefit paid to, or on behalf of, each commissioner during each year (i.e., wages, health insurance premiums, life insurance premiums, FICA taxes, etc.).

RESPONSE: See attached.

MORRIS & BRESSLER, PSC
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- i. Fiscal Court minutes approving each commissioner's appointment and compensation.

RESPONSE: See attached.

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

- j. A document listing the Depreciation Schedule.

RESPONSE: See attached.

MORRIS & BRESSLER, PSC
Ms. Debra Dedden
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Florence, KY 41042

- k. Refer to the Application, Schedule of Adjusted Operations, References. Provide all workpapers used to generate the proposed adjustments A-D.

RESPONSE: See attached.

MORRIS & BRESSLER, PSC
Ms. Debra Dedden
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Florence, KY 41042

REQUEST 2: Provide a breakdown for the number of board meetings each commissioner attended during the test year.

RESPONSE: See attached.

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

REQUEST 3: Identify the number of new sewer connections that Grant Sewer District installed in calendar years 2021 and 2022.

RESPONSE: See attached.

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

REQUEST 4: Provide the method and amount of labor and materials recorded for each new sewer connection used during the test year.

RESPONSE: See attached.

Mr. Paul Harp, Superintendent
GRANT COUNTY SANITARY SEWER DISTRICT

REQUEST 5: Provide a copy of the most recent invoice received for all insurance policies provided to Employees.

RESPONSE: None.

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

REQUEST 6: Refer to Application, Schedule of Adjusted Operations, and Depreciation Schedule. In the Schedule of Adjusted Operations, test year Depreciation expense is \$204,355; in the Depreciation Schedule, Current Depreciation is \$259,515. Reconcile the discrepancy.

RESPONSE: See attached.

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REQUEST 7: Refer to Application, Schedule of Adjusted Operations, adjustment A. Provide a

copy of the contract with Bullock Pen Water District for monthly management fee for labor.

RESPONSE: See attached.

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

REQUEST 8: Refer to Application, Schedule of Adjusted Operations, adjustment B. Provide a copy of the second half of the 2022 invoices from vendors for Purchased Power Expense.

RESPONSE: See attached.

MORRIS & BRESSLER, PSC
Ms. Debra Dedden
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Florence, KY 41042

REQUEST 9: Refer to Application, Schedule of Adjusted Operations, adjustment C. Provide a copy of the second half of the 2022 invoices from vendors for Chemical Expense.

RESPONSE: See attached.

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Ms. Debra Dedden
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Florence, KY 41042

REQUEST 10: Refer to the Application, Schedule of Adjusted Operations, and Exhibit A, Fourth Amended Management and Operational Services Agreement. The Schedule of Adjusted Operations reports the Owner/Manager-Management Fee is \$184,046. Exhibit A reports the annual management fee is \$202,164, reconcile the difference.

RESPONSE: See attached.

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REQUEST 11: Provide the number of occurrences for which late fees were assessed during the calendar years: 2108, 2019, 2020, 2021, and 2022.

RESPONSE: See attached.

Ms. Dianne Cook, Office Manager

GRANT COUNTY SANITARY SEWER DISTRICT

REQUEST 12: Provide the total amount collected for each nonrecurring charge and the number of occurrences for that were assessed during the test year.

RESPONSE: See attached.

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

REQUEST 13: Provide an updated cost justification sheet for each nonrecurring charge listed in Grant Sewer District's tariff.

RESPONSE: See attached.

Mr. Paul Harp, Superintendent
GRANT COUNTY SANITARY SEWER DISTRICT

REQUEST 14a: State the last time Grant Sewer District performed a cost-of-service study (COSS) to review the appropriateness of its current rates and rate design.

RESPONSE: Grant Sewer District conducted a COSS in 2013 in Case No. 2013-00404. This COSS did not review current rates and/or rate design.

Mr. Paul Harp, Superintendent
GRANT COUNTY SANITARY SEWER DISTRICT

REQUEST 14b: Explain whether Grant Sewer District considered filing a COSS with the current rate application and the reasoning for not filing one.

RESPONSE: No.

Mr. Paul Harp, Superintendent
GRANT COUNTY SANITARY SEWER DISTRICT

REQUEST 14c: Explain whether any material changes to Grant Sewer District's system would cause a new COSS to be prepared since the last time it has completed one.

RESPONSE: No.

Mr. Paul Harp, Superintendent
GRANT COUNTY SANITARY SEWER DISTRICT

REQUEST 14d: If there have been no material changes to Grant Sewer District’s system, explain when Grant Sewer District anticipates completing a new COSS.

RESPONSE: The Grant Sewer District is currently evaluating the need to expand its current Wastewater Treatment Plant (WWTP). In that regard, the Grant Sewer District has engaged HMB Professional Engineering, Inc., Mr. Benton Hanson to conduct a Facilities Plan to evaluate various scenarios relating to the upgrade and expansion of the WWTP. At this time, that Facilities Plan has not yet been completed. Once the Facilities Plan is completed (completion is anticipated within the next 30 to 60 days), the Grant Sewer District will evaluate how it will move forward with the upgrade of its current WWTP. Once that decision is made, a COSS will be prepared.

Mr. Paul Harp, Superintendent
GRANT COUNTY SANITARY SEWER DISTRICT

REQUEST 14e: Provide a copy of the most recent COSS that has been performed for Grant Sewer District’s system in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

RESPONSE: The most recent COSS was performed by CMW Engineering in 2013. See Case #2013-00404. In preparing the Responses to this Request for Information, the Grant Sewer District has been unable to locate its copy of the COSS. Grant Sewer District will continue its search for the COSS and provide the requested information when it is located. In the meantime, Grant Sewer District would refer the staff to Case #2013-00404.

Mr. Paul Harp, Superintendent
GRANT COUNTY SANITARY SEWER DISTRICT

REQUEST 15: Refer to Grant Sewer District’s Application, Attachment 5, Current Billing Analysis.

- a. Provide the billing analysis in Excel Spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

RESPONSE: See attached.

MORRIS & BRESSLER, PSC
Ms. Debra Dedden
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- b. Provide a list of applicable adjustments made to the billing analysis and include an explanation of each adjustment.

RESPONSE: See attached.

MORRIS & BRESSLER, PSC
Ms. Debra Dedden
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Florence, KY 41042

- c. Provide the date that Grant Sewer District's meter-reading billing cycle begins.

RESPONSE: The 15th day of each month.

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

- d. State if the date that the billing cycle begins is the date that would best be stated as the effective date of any Order the Commission issues concerning rates in this case.

RESPONSE: June 15, 2023.

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

All documents requested are in portable document format (PDF) and are searchable and appropriately bookmarked 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 2nd 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 this 2nd day of February, 2023.

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

KIMBERLY R PRICE
Notary Public - State at Large
State of Kentucky
Notary ID #KYNP13015
Commission Expires Sep. 19, 2024

CERTIFICATE

The undersigned certifies that a copy of the foregoing Response to the Commission’s Staff Request for information was duly emailed to the below described entities this 2nd day of February, 2023.

Kentucky Attorney General
Via Email: rateintervention@ag.ky.gov

GRANT COUNTY SANITARY SEWER DISTRICT

City of Crittenden
Via Email: bvoelker@gatlinvoelker.com

BY: *Charles Givin*
CHAIRMAN CHARLES GIVIN