

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

**In the Matter of: 2nd SUPPLEMENTAL RESPONSE TO 2ND KY PSC REQUEST FOR DATA AND INFORMATION AS TO APPLICATION OF THE HARRISON COUNTY WATER ASSOCIATION, INC.
REQUEST FOR AN ALTERNATIVE RATE ADJUSTMENT**

CASE NUMBER 2023-0154

***FILED ELECTRONICALLY
807 KAR 5:001***

Comes now the Harrison County Water Association, Inc., by and through counsel, Mr. Jesse P. Melcher, Esq., and hereby provides and/or responds, with supplementations, (not included in the initial responses and/or supplemental responses to KY PSC 2nd request) to KY PSC, 2nd requests of information and documents, from Kentucky Public Service Commission for the above alternative rate adjustment case, as follows:

1. HCWA by this supplementation response, supplements answer 11a of HCWA's 1st response to KY PSC 2nd request for data, by correcting the following:
 - a) All of the Bluegrass Energy Bill surcharge information incorrectly stated the environmental surcharges were calculated by using a calculated number of kwh which was incorrect, wherein, the corrected calculated number should be facility charge, not kwh, and as follows: (facility charge + energy charge + fuel adjustment x 0.11840) for those accounts that don't have demand charges, and (facility charge + energy charge + demand charge + fuel adjustment x 0.11840), for all accounts with a demand charge, which are all stated in the corrected supplemented "11a" electric surcharges.
 - b) All fuel adjustment charges for Bluegrass Energy bills, stated the previous provided calculation was kwh x 0.24440, but the correct calculation should be kwh x 0.024440, which are all stated in the corrected supplemented "11a" electric surcharges. However, the informally requested most recent Blue Grass Energy Bills, for the month of July have a fuel adjustment calculation of kwh x \$0.007830); thus the fuel adjustment calculation is a monthly variable number.

- c) HCWA filed 21 bills (15 BGE, 6 KU) from December 2022, as evidence of expenses for the 2022 test year, however, the 1st response showing KWH used by all accounts showed seventeen BGE accounts and 6 KU accounts). The reason two bills for December from BGE were not submitted, is because account # 7 (bldg. 27, 1st response to Kwh usage request) was closed in September 2022, and account # 16, (pump station 27) was closed in May 2023; neither of these accounts will have future and/or current expenses.
- d) HCWA was informally requested to provide the calculation for the fuel adjustment charges on the KU bills, however, the KU monthly fuel adjustment is a variable number that changes monthly (see copy of email from KU as to fuel adjustment calculation taken from KU website, “KU email regarding fuel adjustment calculation), and copies of all KU bills for the test year of 2022, from January 2022 through December 2022, are being attached hereto as supplemental responses for accurate determination of fuel adjustment charges on KU bill accounts. Those bills are filed in chronological order for each of the six accounts from January to December 2022, Identified as “KU 2022 usage bills” for each account (6 accounts).
- e) HCWA misstated on three (3) Bluegrass Energy accounts, specifically, accounts #2, 8, 10, that they had state sales tax at 6%, when in reality they had not state sales tax, but a 3% franchise tax, which are all stated in the corrected supplemented “11a” electric surcharges.
- f) HCWA further states that Bluegrass Energy for all SC-1 accounts (BGE tariff sheet 55, charges \$8.06 for every KW over 10kw used in a month as a demand charge, and this demand charge is put into the amended surcharge itemization, which are all stated in the corrected supplemented “11a” electric surcharges, and for which the previously submitted bills of KU and BGE for all accounts in November 2022, four accounts had demand charges, specifically; 1) 356-White Oak Tricum Pike (Acct # 130264406006), 2) Connersville Pump (Acct # 13026446008); 3) Republican Pump Station (Acct # 130264406012); 4) US 62 3 Phse Pump St. (Acct # 1302644021); wherein, copies of the most recent bills (month of July) for those accounts are attached hereto. *See. BGE copies of 4 accounts that have had demand charges in the past, July 2023 bills.*

- g) HCWA further amends its petition and responses to note that 2022 Board Compensation was \$31,025, due to non-typical extra meetings; the normal meeting schedule of 1 meeting per month would generate a normal board compensation of 3 members @ \$200 per meeting times 12 meetings = \$7,200; 2 members @\$250.00 per meeting times 12 meetings = \$6,000.00 and 2 member @ 300.00 per meeting times 12 meetings = \$7,200.00 for a total of \$20,400.00.

All of this information is supplemental documentation proof of amendments with stated amendments that do not need additional verification, as they documents speak for themselves and the surcharges at issue.

Respectfully submitted,

s/ MR. JESSE P. MELCHER, ESQ.
HARRISON COUNTY WATER ASSOCIATION, INC.
ATTORNEY
JESSE MELCHER LAW OFFICE, PLLC
MR. JESSE P. MELCHER, ESQ.
P.O. BOX 345
MOUNT OLIVET, KY 41064
606-724-5322 (phone)
jpmecher@yahoo.com