

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

**In the Matter of:**

**ELECTRONIC APPLICATION )**  
**OF HARDIN COUNTY WATER ) CASE NO. 2023-00247**  
**DISTRICT NO. 2 FOR A )**  
**GENERAL ADJUSTMENT OF )**  
**RATES )**

**RESPONSE OF**  
**HARDIN COUNTY WATER DISTRICT NO. 2**  
**TO**  
**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION**  
**DATED NOVEMBER 30, 2023**

**FILED: DECEMBER 15, 2023**

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

**In the Matter of:**

**ELECTRONIC APPLICATION )  
OF HARDIN COUNTY WATER ) CASE NO. 2023-00247  
DISTRICT NO. 2 FOR A )  
GENERAL ADJUSTMENT OF )  
RATES )**

**RESPONSE OF HARDIN COUNTY WATER DISTRICT NO. 2  
TO COMMISSION STAFF’S THIRD REQUEST FOR INFORMATION**

Comes Hardin County Water District No. 2 (“Hardin District No. 2”) for its Response to Commission Staff’s Third Request for Information, and states as shown on the following pages.



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


**In the Matter of:**

**ELECTRONIC APPLICATION )  
OF HARDIN COUNTY WATER ) CASE NO. 2023-00247  
DISTRICT NO. 2 FOR A )  
GENERAL ADJUSTMENT OF )  
RATES )**

**CERTIFICATION OF RESPONSE OF HARDIN COUNTY  
WATER DISTRICT NO. 2 TO COMMISSION STAFF'S  
THIRD REQUEST FOR INFORMATION**

This is to certify that I have supervised the preparation of Hardin County Water District No. 2's Responses to Commission Staff's Third Request for Information. The response submitted on behalf of Hardin County Water District No. 2 is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Date: December 15, 2023

  
\_\_\_\_\_  
Shaun Yourayich, General Manager  
Hardin County Water District No. 2

## CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on December 15, 2023; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

  
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Damon R. Talley

**HARDIN COUNTY WATER DISTRICT NO. 2****CASE NO. 2023-00247****Response to Commission Staff's Third Request for Information****Question No. 1****Responding Witness: Mandy Isham, Finance Manager**

**Q-1. Refer to the Application, Schedule of Adjusted Operations (SAO), Other Water Revenues, Miscellaneous Service Revenue. Provide the 2022 trial balance accounts and a detailed breakdown of the items totaling \$494,895.**

**A-1.** The portion of Hardin District No. 2's Trial Balance showing each item of income which was included under the category "**Miscellaneous Service Revenues**" in the SAO prepared by Vaughn Williams is filed separately in Excel spreadsheet format as **Exhibit 3-1.xlsx**. The Miscellaneous Service Revenues total **\$494,895** and are also shown on Hardin District No. 2's 2022 Annual PSC Report on Reference Page 27 under Account No. 471.

The Miscellaneous Service Revenues are composed of the following:

Billing and Collecting Sewer Revenues for the City of Elizabethtown	\$228,899
Non-recurring Charges	\$258,615
Providing Sewer Readings to Hardin District No. 1 and other Miscellaneous Services Provided for Hardin District No. 1	\$7,381
<b>Total</b>	<b>\$494,895</b>

**HARDIN COUNTY WATER DISTRICT NO. 2**

**CASE NO. 2023-00247**

**Response to Commission Staff's Third Request for Information**

**Question No. 2**

**Responding Witness: Mandy Isham**

**Q-2. Refer to the Application, SAO, Other Water Revenues, Other Water Revenue. Provide the 2022 trial balance accounts and a detailed breakdown of the items totaling \$295,136.**

A-2. The portion of Hardin District No. 2's Trial Balance showing each item of income which was included under the category "**Other Water Revenues**" in the SAO prepared by Vaughn Williams is filed separately in Excel spreadsheet format as **Exhibit 3-2.xlsx**. The Other Water Revenues total **\$295,136** and are also shown on Hardin District No. 2's 2022 Annual PSC Report on Reference Page 27 under Account No. 474.

The Other Water Revenues are composed of: (1) Contractual Services (payment of \$2,000 per month from Hardin District No. 2's Sewer Division to its Water Division); (2) Laboratory Fees charged by Hardin District No. 2 for certain laboratory tests performed for other neighboring utilities; and (3) Late Payment Fees (Forfeited Discounts). These revenues are itemized as follows:

Contractual Services Paid by Sewer Division to Water Division	\$24,000
Laboratory Fees	\$18,809
Late Payment Fees	\$261,372
Adjustments	(\$9,045)
<b>Total</b>	<b>\$295,136</b>

**HARDIN COUNTY WATER DISTRICT NO. 2**

**CASE NO. 2023-00247**

**Response to Commission Staff's Third Request for Information**

**Question No. 3**

**Responding Witness: Vaughn Williams, Kenvirons**

**Q-3. Refer to Hardin District No. 2's response to Commission Staff's First Request for Information (Staff's First Request), Item 35, which states that in 2022, late fee revenue totaled \$261,371.51. Explain where the 2022 late fee total is located in the SAO.**

A-3. The Late Fee Revenue of \$261,371.51 is included in the SAO under the category of "Other Water Revenues." The total amount of Other Water Revenues in 2022 was \$295,136. This amount was taken from Hardin District No. 2's Annual PSC Report for 2022 on Reference Page 27 under Account No. 474.

It should be noted that the amount of Late Payment Fees shown in response to Question 35 of the PSC Staff's First Request for Information—\$261,371.51—was obtained from the billing reports generated by Muni-Link, which is the billing software used by Hardin District No. 2. This amount reflects what the customers were initially billed for Late Payment Fees, and not the actual amount after various adjustments were made to correct billing errors, etc. As shown on the Trial Balance, only \$252,327 was actually collected.



**HARDIN COUNTY WATER DISTRICT NO. 2**

**CASE NO. 2023-00247**

**Response to Commission Staff's Third Request for Information**

**Question No. 4**

**Responding Witness: Vaughn Williams**

- Q-4. Refer to Hardin District No. 2's response to Staff's First Request, Item 36, which states that in 2022, nonrecurring charges totaled \$258,615. Explain where the 2022 nonrecurring charges total is located in the SAO.**
- A-4. The Non-Recurring Charges revenue of \$258,216 is included in the SAO under the category of "Miscellaneous Service Revenues." The total amount of Miscellaneous Service Revenues in 2022 was \$494,895. This amount was taken from Hardin District No. 2's Annual PSC Report for 2022 on Reference Page 27 under Account No. 471.

**HARDIN COUNTY WATER DISTRICT NO. 2**

**CASE NO. 2023-00247**

**Response to Commission Staff's Third Request for Information**

**Question No. 5**

**Responding Witness: Shaun Youravich, General Manager**

**Q-5. Refer to the Application, SAO, Adjustment C.**

- a. Provide the number of gallons purchased from Louisville Water Company during the test year 2022.**
- b. Provide the total number of gallons purchased from Louisville Water Company in the most recent twelve months.**

A-5. a. A table showing the gallons purchased and the cost of the water which Hardin District No. 2 purchased from Louisville Water Company during calendar year 2022 and for the most recent twelve months from December 2022 through November 2023 is filed separately in Excel spreadsheet format as **Exhibit 3-5.xlsx**. A summary of the gallons purchased and cost are as follows:

<b>Time Period</b>	<b>Gallons Purchased</b>	<b>Cost</b>
Calendar Year 2022	387,715,000	\$989,113
December 2022 through November 2023	370,429,000	\$966,689

b. See response to subpart (a).