

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

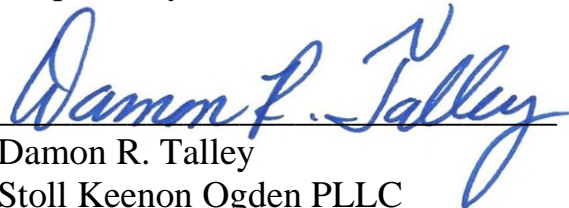
**THIRD SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S
FIRST REQUEST FOR INFORMATION**

Hardin County Water District No. 2 (“Hardin District”) gives notice of the filing of its Third Supplemental Response to Commission Staff Request 1-12d reflecting a summary of all expenses incurred in conjunction with this proceeding as of January 15, 2024.

Previously unsubmitted supporting invoices for expenses are also attached.

Dated: January 17, 2024

Respectfully submitted,



Damon R. Talley
Stoll Keenon Ogden PLLC
P.O. Box 150
Hodgenville, KY 42748-0150
Telephone: (270) 358-3187
Fax: (270) 358-9560
damon.talley@skofirm.com

Gerald E. Wuetcher
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
Telephone: (859) 231-3017
Fax: (859) 259-3597
gerald.wuetcher@skofirm.com

*Counsel for Hardin County Water District
No. 2*

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8 and the Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was submitted electronically to the Public Service Commission on January 17, 2024 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.



Damon R. Talley

**Hardin County Water District No. 2
Case No. 2023-00247**

Analysis of Cost of Case No. 2023-00247

As of January 15, 2024

Line No.	Item	Amount
1.	Accounting	\$ 0.00
2.	Engineering	\$ 0.00
3.	Legal	\$ 92,596.50
4.	Consultants	\$ 26,465.00
5.	Other Expenses	\$ 5,599.46
6.	Total	\$124,660.96

Individual Expenses to Date

Invoice	Date	Vendor	Nature of Expense	Check No.	Amount	USoA Account
20230914	09/13/2023	Kenvirons	Rate Study	8568	\$ 26,465.00	631
1021360	09/05/2023	Stoll Keenon Ogden PLLC	Legal Services	8559	\$ 11,133.50	633
1024305	10/04/2023	Stoll Keenon Ogden PLLC	Legal Services	8631	\$ 33,872.00	633
1027289	11/03/2023	Stoll Keenon Ogden PLLC	Legal Services	8711	\$ 23,677.50	633
1030108	12/04/2023	Stoll Keenon Ogden PLLC	Legal Services	8799	\$ 8,626.50	633
1033115	01/04/2024	Stoll Keenon Ogden PLLC	Legal Services	8871	\$ 15,286.50	633
23953	09/30/2023	Jobe Publishing Inc.	Public Notice	8643	\$ 2,025.00	660
24467	12/31/2023	Jobe Publishing Inc.	Public Notice	8848	\$ 72.00	660
339405	10/29/2023	Paxton Media Group	Public Notice	8703	\$ 3,394.05	660
	12/27/2023	Paxton Media Group	Public Notice		\$ 108.41	660
TOTAL					\$124,660.46	

Jobe Publishing Inc.

P.O. Box 546
Cave City, KY 42127
270-786-2676

We accept all major credit cards.

Invoice

Date	Invoice #
12/31/2023	25467

Bill To
Hardin Co Water Dist #2 PO Box 970 Elizabethtown, KY 42748

P.O. No.	Terms	Project
	Net 30	

Quantity	Description	Rate	Amount
	Hart Co News Herald 12/28/2023 6" ad (Public Hearing/Rate Adjustment)	72.00	72.00
		Total	\$72.00

Paxton Media Group
201 South 4th Street Paducah, KY 42003

Michelle Irwin
Hardin Co Water District #2
PO Box 970
Elizabethtown, KY 42702-0970
(270)737-1056

Class Display Ad #70851561 Summary:

Slug Line: PUBLIC HEARING On January 11,
Size: 1.00 x 3.17

Publication Cost \$108.41
Adjustments \$0.00
Net Cost \$108.41
Prepaid Amount \$0.00
Amount Due \$108.41

Order Detail:

Publication	Start	Stop	Insertions	Cost	Adjustments	Total
107LHNE1 Larue County Herald News	12/27/23	12/27/23	1	33.15	0.00	33.15
107NED1 News-Enterprise	12/27/23	12/27/23	1	75.26	0.00	75.26

Stoll Keenon Ogden PLLC

P.O. Box 150

112 North Lincoln Boulevard

Hodgenville, Kentucky 42748

(270) 358-3187

Tax ID # 61-0421389

Hardin Co. Water District No. 2
misham@hcwd2.org

January 4, 2024
Invoice #: 1033115
Account #: 432038/178794

Re: 2023 Rate Increase

Fees rendered this bill	\$ 15,286.50
Total Current Charges This Matter	\$ 15,286.50

Please return this page with payment to:

Stoll Keenon Ogden PLLC
PO Box 11969
Lexington KY 40579-1969

Or pay electronically via ACH to:

Stoll Keenon Ogden PLLC
Fifth Third Bank, Cincinnati OH
ABA/Bank Routing Number: [REDACTED]
Account Number: [REDACTED]
Please reference your account and invoice #s
Email remittance to:
payments@skofirm.com

Stoll Keenon Ogden PLLC

P.O. Box 150

112 North Lincoln Boulevard

Hodgenville, Kentucky 42748

(270) 358-3187

Tax ID # 61-0421389

Hardin Co. Water District No. 2
misham@hcwd2.org

January 4, 2024
Invoice #: 1033115
Account #: 432038/178794

Re: 2023 Rate Increase

Fees rendered this bill	\$ 15,286.50
Total Current Charges This Matter	\$ 15,286.50

Keep this copy for your records.

Professional Services for the period through 12/31/23, including the following:

Re: 2023 Rate Increase

Our Reference: 432038/178794/DRT/2404

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
11/29/23	Conferred with D. Talley re upcoming Request for Information	GEW	0.10
12/01/23	Prepared email memo to client and to Vaughn Williams re PSC Staff's Third Request for Information; assigned responsibility to them for answering designated questions contained in the Request for Information	DRT	0.20
12/01/23	Prepared email memo to Emily Childress and provided the name of the Responding Witness for each of the questions contained in the PSC Staff's Third Request for Information	DRT	0.10
12/04/23	Prepared template for Response to PSC Staff's Third Request for Information; prepared Signature Page to certify response and emailed Signature Page to client	ESC	0.50
12/05/23	Conferred with D. Talley re witness preparation for PSC Hearing	GEW	0.30
12/11/23	Reviewed and analyzed Trial Balance, General Ledger and other information provided by client to answer Questions 1, 2, and 5 of the PSC Staff's Third Request for Information; conferred with Mandy Isham re these documents; reviewed documents previously filed with the PSC	DRT	1.50
12/11/23	Prepared email memo to Emily Childress re preparing Notice of Public Hearing to be published in local newspapers to comply with PSC Order	DRT	NO CHARGE
12/12/23	Reviewed email memo from Mandy Isham re revised information needed to answer Questions 1 and 2 of PSC Staff's Third Request for Information; reviewed both Excel files prepared by Mandy Isham	DRT	0.50
12/12/23	Reviewed email memo from Vaughn Williams re Questions 3 and 4 of the PSC Staff's Third Request for Information; reviewed information provided by Vaughn Williams; prepared reply email memo to Vaughn Williams	DRT	0.30
12/12/23	Prepared Public Notice of Hearing for January 11, 2024 PSC Hearing; created outline for introducing witnesses at rate case Hearing	ESC	0.50
12/13/23	Reviewed information prepared by client re water purchased from Louisville Water Company; reviewed Rate Study prepared by Vaughn Williams re adjustment made for Purchased Water Expense; revised answers to Questions 3 and 4	DRT	0.50
12/13/23	Prepared answer to Question 5; reviewed relevant portions of PSC Annual Report needed to verify information to be included in response to Questions 1, 2, 3, 4, and 5 of PSC Staff's Third Request for Information	DRT	0.50

Keep this copy for your records.

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
12/13/23	Reviewed email memo from client re corrected Non-Recurring Charge Justification Sheets for a few of the Non-Recurring Charges; reviewed the revised or corrected Cost Justification Sheets; prepared reply email memo to Shaun	DRT	0.40
12/13/23	Exchanged email memos with Jerry Wuetcher re need to file the corrected Cost Justification Sheets in Response to the PSC Staff's First Request for Information, Question 37	DRT	NO CHARGE
12/13/23	Analyzed Trial Balances and General Ledger Excel files provided by client and reconciled the amounts for Miscellaneous Service Revenues and Other Water Revenues previously filed with the PSC and contained in the 2022 PSC Annual Report; prepared written responses to Questions 1 and 2 of the PSC Staff's Third Request for Information	DRT	1.60
12/13/23	Prepared email memo to client re original dates of appointment for each Commissioner and the most recent re-appointment information	DRT	0.20
12/14/23	Reviewed email memo from Lea Ona and reviewed table showing when each Commissioner was originally appointed, when current term ends and Fiscal Court Minutes confirming the current appointments of each Commissioner	DRT	0.30
12/14/23	Exchanged email memos with Emily Childress re best way to present some of the information used to answer the PSC Staff's Third Request for Information	DRT	NO CHARGE
12/14/23	Reviewed first complete draft version of Response to PSC Staff's third Request for Information; made list of suggested changes; prepared email memo to Emily Childress with suggested changes	DRT	0.80
12/14/23	Prepared email memo to client re draft answer to some of the questions to be included in the Response to PSC Staff's Third Request for Information; solicited feedback from client re accuracy of the amounts included in the Response	DRT	0.20
12/14/23	Reviewed Excel spreadsheet used to answer Question 5 of the PSC Staff's Third Request for Information; calculated amount of water purchased from Louisville Water and cost of the water; prepared email memo to Emily Childress re results of these calculations	DRT	0.30
12/14/23	Prepared Hardin District No. 2's Response to PSC Staff's Third Request for Information in ongoing rate case; prepared accompanying Exhibits to be filed with Response; prepared Transmittal Letter to be filed with Response	ESC	1.50
12/14/23	Prepared and filed Second Supplement to Response to PSC Staff's First Request for Information 1-12d; prepared email memo to D. Talley to request invoices	GEW	0.60
12/14/23	Prepared Rate Case Expense Report	GEW	0.50
12/15/23	Reviewed email memo from Mandy Isham; reviewed Excel file received from client for use in answering Question 5 of the PSC Staff's Third Request for Information; prepared reply email memo to	DRT	0.20

Keep this copy for your records.

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	Mandy Isham		
12/15/23	Reviewed email memo from Emily Childress re the revised Response to PSC Staff's Third Request for Information; reviewed and approved the revised version of the Response to PSC Staff's Third Request for Information	DRT	0.40
12/15/23	Exchanged additional email memos with Emily Childress re the three (3) Excel Exhibits to be filed as part of the Response to the PSC Staff's Third Request for Information	DRT	NO CHARGE
12/15/23	Prepared email memo to client and attached Response to PSC Staff's Third Request for Information; discussed Next Steps	DRT	0.20
12/15/23	Revised Response to PSC's Third Request for Information to incorporate feedback from D. Talley; electronically filed Transmittal Letter, Response, and three accompanying Exhibits with the Public Service Commission	ESC	0.80
12/18/23	Prepared Amended Response to PSC Staff's First Request for Information to include corrected Cost Justification Sheets	GEW	0.50
12/19/23	Prepared two-page list of legal and other issues to discuss with Jerry Wuetcher and client re upcoming PSC Hearing and preparation of witnesses; prepared email memo to Jerry Wuetcher and attached list of issues and strategic decisions to be made	DRT	0.60
12/19/23	Made revisions to draft Amended Response to PSC Staff's First Request for Information; filed Amended Response to PSC Staff's First Request for Information	GEW	0.50
12/20/23	Prepared email memo to Legal Notice Department at The Hart County News-Herald re instructions for publishing Notice of Public Hearing; attached Notice of Public Hearing; reviewed reply email memo from newspaper confirming that Notice will be published on December 28, 2023; exchanged follow-up email memos with newspaper	DRT	0.50
12/20/23	Prepared email memo to client with instructions for publishing the Notice of Public Hearing in The News-Enterprise and in The LaRue County Herald-News newspapers on December 27, 2023; provided letter of instructions for client to send to newspapers; reviewed reply email memo from client; reviewed email memo from newspapers confirming that Notice of Public Hearing will be published on December 27, 2023 in both newspapers; reviewed Proof of Notice of Public Hearing; approved Proof; prepared follow-up email memos to client and newspapers re publication of Notice of Public Hearing	DRT	0.80
12/20/23	Prepared email memo to Jerry Wuetcher and included Public Notice; informed him that request for publication had been sent to all three (3) newspapers; requested Jerry Wuetcher to file the necessary Notice with the PSC	DRT	NO CHARGE
12/20/23	Prepared Notice of Request for Publication of Public Hearing Notice; filed Notice with PSC	GEW	0.50
12/21/23	Exchanged email memos with Jerry Wuetcher re written	DRT	NO CHARGE

Keep this copy for your records.

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	communications with Hart County News-Herald re request to publish Notice of Public Hearing		
12/21/23	Prepared email memo to client and witnesses to schedule witness preparation meeting	DRT	0.20
12/22/23	Reviewed email memo from Hart County News-Herald re Proof of Notice of Public Hearing; reviewed Proof of proposed publication of Notice and compared it to the Notice of Public Hearing sent to the newspaper; prepared reply email memo to newspaper and approved the accuracy of the Proof to be published	DRT	0.20
12/22/23	Conferred with Jerry Wuetcher and discussed numerous legal issues about upcoming Public Hearing; discussed strategic decisions which need to be made by client prior to the Public Hearing; made list of recommendations which will require decisions by the District; discussed list of witnesses and order of presentation; prepared memo to file	DRT	1.30
12/22/23	Conferred with D. Talley re PSC Hearing issues, discussed legal strategy, and dates to schedule witness preparation	GEW	1.20
12/27/23	Prepared Notice of Witnesses Offering Testimony at PSC Public Hearing	GEW	1.10
12/28/23	Revised and filed PSC Notice of Witnesses Scheduled to Testify at Hearing; prepared and filed Proof of Publication of Hearing Notice; prepared PSC Transmittal Letters	GEW	1.30
12/29/23	Reviewed PSC Application and Exhibits; reviewed all Responses to PSC Staff's Information Requests; prepared questions for cross-examination of witnesses for use in the witness preparation sessions	GEW	3.50
12/30/23	Reviewed various Exhibits filed with PSC and numerous Responses to the PSC Staff's Requests for Information; prepared outline of questions to use to prepare three (3) of the witnesses for the Formal Hearing at the PSC on January 11, 2024	DRT	2.80
12/30/23	Continued reviewing documents filed with PSC in the rate case to prepare for witness preparation sessions; prepared additional questions for cross-examination of witnesses to be used during witness preparation sessions	GEW	8.10
12/31/23	Reviewed and revised cross-examination questions for witnesses; conferred with D. Talley re cross-examination of witnesses, direct testimony, and overview of PSC Hearing; discussed order of witnesses at PSC Hearing; made other preparations for witness preparation sessions	GEW	2.50
Total Services			\$15,286.50

Keep this copy for your records.

Summary of Services

<u>Init</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
GEW	Wuetcher, G E	20.70	405.00	8,383.50
DRT	Talley, D R	14.60	405.00	5,913.00
ESC	Childress, Emily	3.30	300.00	990.00
	Total Services	38.60		\$15,286.50

TOTAL FEES & DISBURSEMENTS \$15,286.50

Total Current Charges This Matter \$15,286.50