

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)**

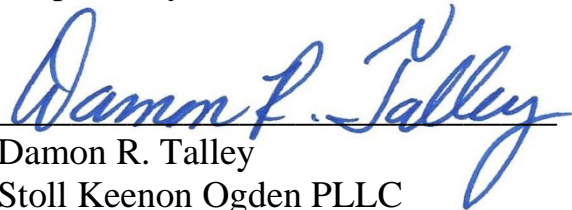
**FIRST SUPPLEMENTAL RESPONSE TO COMMISSION STAFF’S FIRST
REQUEST FOR INFORMATION**

Hardin County Water District No. 2 (“Hardin District”) gives notice of the filing of its First Supplemental Response to Commission Staff Request 1-12d reflecting a summary of all expenses incurred in conjunction with this proceeding as of November 15, 2023.

Previously unsubmitted supporting invoices for expenses are also attached.

Dated: November 15, 2023

Respectfully submitted,



Damon R. Talley
Stoll Keenon Ogden PLLC
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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 November 15, 2023 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 November 15, 2023

| Line No. | Item | Amount |
|----------|-----------------------|---------------------|
| 1. | Accounting | \$ 0.00 |
| 2. | Engineering | \$ 0.00 |
| 3. | Legal | \$ 68,683.00 |
| 4. | Consultants | \$ 26,465.00 |
| 5. | Other Expenses | \$ 5,419.05 |
| 6. | Total | \$100,567.05 |

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 |
| 23953 | 09/30/2023 | Jobe Publishing Inc. | Public Notice | 8643 | \$ 2,025.00 | 660 |
| 339405 | 10/29/2023 | Paxton Media Group | Public Notice | 8703 | \$ 3,394.05 | 660 |
| TOTAL | | | | | \$100,567.05 | |

Jobe Publishing Inc.

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

We accept all major credit cards.

Invoice

| Date | Invoice # |
|-----------|-----------|
| 9/30/2023 | 23953 |

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

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | Description | Rate | Amount |
|----------|--|--------------|------------|
| 3 | Hart Co News Herald 75"ad 09/28/23 10/05/23 10/12/23 (Customer Notice/Rates) | 675.00 | 2,025.00 |
| | | Total | \$2,025.00 |

News-Enterprise, KY Stand, Leb Ent
 CKY News, Casey, Springfield, LaRue Herald, Grayson
 PO Box 1200
 Paducah, KY 42002-1200

ADVERTISING INVOICE / STATEMENT 1/1

| BILLING DATE | TERMS OF PAYMENT |
|--------------|------------------|
| 10/29/2023 | Standard Terms |

Michelle Irwin
 Hardin Co Water District #2
 PO Box 970
 Elizabethtown, KY 42702-0970

| BILLED ACCOUNT NO. | AGENCY/CLIENT |
|-----------------------------|---------------|
| 70034423 | 70034423 |
| NAME OF AGENCY/CLIENT | |
| Hardin Co Water District #2 | |

| DATE | AD # | TRANS # | DESCRIPTION | INS | UNITS | AMOUNT | TOTAL |
|------------|----------|-----------|--|--------|----------------------|-----------------|--------------------------------|
| 09/27/2023 | 70780523 | 301978073 | Balance Forward CUSTOMER NOTICE On or about - 107NED1 News-Enterprise - 107LHNE1 Larue County Herald News | | | 0.00 1131.35 | 0.00 1,131.35 |
| 10/04/2023 | 70780523 | 301991699 | CUSTOMER NOTICE On or about - 107NED1 News-Enterprise - 107LHNE1 Larue County Herald News | 1 1 | 64.75 in 64.75 in | 1131.35 | 2,262.70 |
| 10/11/2023 | 70780523 | 302006045 | CUSTOMER NOTICE On or about - 107NED1 News-Enterprise - 107LHNE1 Larue County Herald News | 1 1 | 64.75 in 64.75 in | 1131.35 | 3,394.05 |

| OCTOBER 2023 | AGING | | | |
|--------------|----------------|-------------|-----------|-----------|
| | September 2023 | August 2023 | July 2023 | June 2023 |
| \$ 3,394.05 | \$ 0.00 | \$ 0.00 | \$ 0.00 | \$ 0.00 |

| TOTAL NET AMOUNT DUE |
|----------------------|
| \$ 3,394.05 |

PLEASE RETURN THIS PORTION
 WITH YOUR REMITTANCE

If you desire to charge this amount to your credit card, please complete the following information and return to the address below: Visa Mastercard Discover American Express
 Acct# _____ Exp Date: _____
 Signature _____

| BILLED ACCOUNT NO. | BILLED ACCOUNT NAME | AMOUNT DUE |
|--------------------|-----------------------------|--------------------|
| 107 70034423 | Hardin Co Water District #2 | \$ 3,394.05 |

| REMIT TO |
|---|
| News-Enterprise, KY Stand, Leb Ent c/o Paxton Media Group PO Box 1200 Paducah, KY 42002-1200 Phone: 270-575-8731 Fax: 270-575-8726 |

Payment in full is due upon receipt of the statement. A service charge on all balances over 30 days will be computed by a 'Periodic Rate' of 1-1/2% per month, which is an ANNUAL PERCENTAGE RATE OF 18%, this applies to the previous balance after deducting current payments and credits appearing on your statement. Refunds less than \$10.00 will be refunded electronically, donated to NIE, or collected in cash at the newspaper.

107700344230000000000339405

Remittance Advice

Billing Date
 10/30/2023

70034423000000000339405

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

November 3, 2023
Invoice #: 1027289
Account #: 432038/178794

Re: 2023 Rate Increase

| | |
|--|---------------------|
| Fees rendered this bill | \$ 23,677.50 |
| Total Current Charges This Matter | \$ 23,677.50 |

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

November 3, 2023
Invoice #: 1027289
Account #: 432038/178794

Re: 2023 Rate Increase

| | |
|--|---------------------|
| Fees rendered this bill | \$ 23,677.50 |
| Total Current Charges This Matter | \$ 23,677.50 |

Keep this copy for your records.

Professional Services for the period through 10/31/23, 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> |
|-------------|---|-------------|--------------|
| 10/02/23 | Conferred with Jerry Wuetcher and assigned responsibility for answering certain questions to the PSC Staff's First Request for Information | DRT | 0.30 |
| 10/02/23 | Prepared lengthy email memo to SKO attorney Emily Childress and assigned responsibility for assisting with preparation of the Response to PSC Staff's First Request for Information; forwarded template of Response for her to revise | DRT | NO CHARGE |
| 10/02/23 | Prepared email memo to Shaun re Next Steps in rate case and deadline for filing Response to PSC Staff's First Request for Information | DRT | 0.20 |
| 10/02/23 | Reviewed the PSC Staff's First Request for Information and designated the Responding Witness for each question | DRT | 0.50 |
| 10/02/23 | Conferred with D. Talley re preparing Response to First Request for Information; prepared and submitted an Open Records Act request to Public Service Commission for prior nonrecurring charge tariff filings | GEW | 0.90 |
| 10/03/23 | Identified the appropriate persons to be designated as the Responding Witness for each of the 39 questions included in the PSC Staff's First Request for Information; prepared email memo to Emily Childress and forwarded this list to her | DRT | 0.50 |
| 10/03/23 | Exchanged several email memos with Emily Childress re preparing the template for the Response to the PSC Staff's First Request for Information | DRT | NO CHARGE |
| 10/03/23 | Prepared template for Response to PSC Staff's First Request for Information in ongoing rate case. | ES | 0.80 |
| 10/04/23 | Reviewed Deficiency Letter from PSC Executive Director | DRT | NO CHARGE |
| 10/04/23 | Exchanged email memos with Jerry Wuetcher re preparing Motion for Deviation | DRT | NO CHARGE |
| 10/04/23 | Prepared email memo to client and Board Chairman re Deficiency Letter and steps being taken to cure the filing deficiency; forwarded the PSC Deficiency Letter to client | DRT | 0.20 |
| 10/04/23 | Reviewed applicable PSC Regulation re need to file Depreciation Study as Exhibit to PSC Application and regulation which permits filing Motion for Deficiency in General Rate case | DRT | 0.20 |
| 10/04/23 | Conferred with client re documents needed to answer the PSC Staff's First Request for Information; prepared lengthy email memo to client with list of needed documents; reviewed email memo from client with some of the documents; reviewed these documents; | DRT | 1.10 |

Keep this copy for your records.

| <u>Date</u> | <u>Description</u> | <u>Tkpr</u> | <u>Hours</u> |
|-------------|---|-------------|--------------|
| | prepared follow-up email memo to client re documents | | |
| 10/04/23 | Reviewed first draft of Motion for Deviation prepared by Jerry Wuetcher; prepared email memo to Jerry Wuetcher with list of suggested edits; reviewed and approved revised version of Motion for Deviation | DRT | 0.20 |
| 10/04/23 | Prepared email memo to client and attached Motion for Deviation; discussed Next Steps | DRT | 0.20 |
| 10/04/23 | Commenced preparing responses to PSC Staff's First Request for Information | DRT | 0.60 |
| 10/04/23 | Prepare motion for deviation; research on studies of employer health insurance practices | GEW | 2.60 |
| 10/05/23 | Exchanged numerous email memos with client re documents to be filed as Exhibits to the District's Response to the PSC Staff's First Request for Information; reviewed over 30 documents provided by client; prepared follow-up email memos to client with questions about some of the documents | DRT | 4.70 |
| 10/05/23 | Reviewed Minutes of Board Meetings for 2020, 2021, and 2022 | DRT | 0.80 |
| 10/06/23 | Reviewed and analyzed numerous documents provided by client in response to PSC Staff's First Request for Information; prepared answers to several of the questions contained in PSC Staff's First Request for Information | DRT | 1.10 |
| 10/06/23 | Conferred with Emily Childress re preparing Response to PSC Staff's First request for Information; discussed which documents will be designated as Exhibits to the Response and filed separately and which documents will be filed with the Response as Attachments | DRT | NO CHARGE |
| 10/06/23 | Reviewed lengthy and detailed email memo from Emily Childress re the questions for which the client has not yet produced any documents or has provided only a portion of the needed information; prepared reply email memo to Emily Childress | DRT | 0.30 |
| 10/06/23 | Reviewed and analyzed documents provided by client in Response to PSC Staff's First Request for Information; organized documents so they will be available to upload to the PSC website when the Response to PSC Staff's First Request for Information is filed | ES | 1.10 |
| 10/06/23 | Conferred with D. Talley re strategy for responding to PSC Staff data requests in rate case | ES | 0.30 |
| 10/07/23 | Reviewed and analyzed numerous documents provided by client in response to PSC Staff's First Request for Information; revised some of the documents; prepared email memo to client with list of questions about some of the documents; prepared narrative answers to some of the questions to the PSC Staff's First Request for Information | DRT | 2.50 |
| 10/07/23 | Prepared email memos to Emily Childress re PSC Staff's First Request for Information; provided instructions re revising some of the documents and Tables provided by client to conform to PSC | DRT | NO CHARGE |

Keep this copy for your records.

| <u>Date</u> | <u>Description</u> | <u>Tkpr</u> | <u>Hours</u> |
|-------------|---|-------------|--------------|
| | expectations | | |
| 10/09/23 | Prepared lengthy email memo to Jerry Wuetcher and assigned him a list of the remaining questions of the PSC Staff's First Request for Information to answer; prepared another email memo to Jerry Wuetcher and attached invoices from Kenvirons and SKO to use in answering Question 12 of the PSC Staff's First Request for Information | DRT | 0.30 |
| 10/09/23 | Reviewed email memo from Emily Childress and reviewed draft Response to some of the Questions contained in the PSC Staff's First Request for Information; prepared email memo to Emily Childress and suggested revisions to some of the narrative responses | DRT | 0.30 |
| 10/09/23 | Conferred with Emily Childress re Response to PSC Staff's First Request for Information; discussed some of the documents provided by client; made list of additional documents needed from client | DRT | NO CHARGE |
| 10/09/23 | Reviewed narrative answer to Question 37 of the PSC Staff's First Request for Information and draft version of Cost Justification Sheets for Non-Recurring Charges prepared by Shaun Youravich; conferred with Shaun Youravich re Questions 37 and other questions which he needs to answer | DRT | 0.70 |
| 10/09/23 | Prepared email memo to Jerry Wuetcher and attached Debt Service Schedule and other information which he needs to answer Question 14 of the PSC Staff's First Request for Information | DRT | NO CHARGE |
| 10/09/23 | Prepared first draft of answers to 11 questions contained in the PSC Staff's First Request for Information | DRT | 1.30 |
| 10/09/23 | Drafted correspondence to client re documents needed to include in Response to PSC Staff's First Request for Information | ES | 0.70 |
| 10/09/23 | Prepared portion of the District's Response to PSC Staff's First Request for Information re eight subparts to question number one | ES | 2.00 |
| 10/09/23 | Conferred with D. Talley re status of Response to PSC Staff's First Request for Information; prepared memo to file re next steps | ES | 0.40 |
| 10/09/23 | Prepared exhibit of Board meeting minutes from 2020, 2021, and 2022 to prepare for filing in Response to PSC Staff's First Request for Information | ES | 0.60 |
| 10/10/23 | Exchanged numerous email memos with Emily Childress re preparing responses to PSC Staff's First Request for Information | DRT | NO CHARGE |
| 10/10/23 | Reviewed email memo from Jerry Wuetcher re Rate Case Expenses and draft answer to Question 12 of PSC Staff's First Request for information; located needed documents; reviewed and revised the response to Question 12 and made corrections to the Schedules for Question 12; prepared email memo to Jerry Wuetcher re other Rate Case Expenses | DRT | 0.70 |
| 10/10/23 | Reviewed email memos from client re documents needed to answer | DRT | 1.10 |

Keep this copy for your records.

| <u>Date</u> | <u>Description</u> | <u>Tkpr</u> | <u>Hours</u> |
|-------------|--|-------------|--------------|
| | PSC Staff's First Request for Information; reviewed revised answer to Question 1(h) re Commissioners' salary and benefits; reviewed draft narrative answer to Questions 28 & 37 of PSC Staff's First Request for Information; made notes on revisions which need to be made and list of questions to ask client | | |
| 10/10/23 | Reviewed some of the documents provided by client to answer Question 1(b) of the PSC Staff's First Request for Information; conferred with District's Auditor re Question 1(b) and other accounting questions; prepared follow-up email memos to client re these questions and needed documents | DRT | 0.60 |
| 10/10/23 | Reviewed PSC Annual Report re Extraordinary Income and Expenses; exchanged email memos with client re this matter; determined that the District had no Extraordinary Income or Expense items during the Test Year | DRT | 0.60 |
| 10/10/23 | Prepared narrative answers to several of the questions contained in the PSC Staff's First Request for Information | ES | 2.10 |
| 10/10/23 | Prepared narrative answers to several of the questions included in PSC Staff's First Request for Information | GEW | 3.10 |
| 10/11/23 | Reviewed and analyzed documents provided by client re Miscellaneous Expenses; made revisions to Schedule C-2 re Miscellaneous Expenses | DRT | 0.70 |
| 10/11/23 | Reviewed revised Schedule re estimated Rate Case Expenses; reviewed revised Schedule re actual Rate Case Expenses incurred to date; prepared email memo to Jerry Wuetcher with two (2) suggested edits | DRT | 0.30 |
| 10/11/23 | Reviewed lengthy email memo from Emily re list of remaining Questions to be answered and those assigned to me; reviewed first, incomplete draft of the Response to PSC Staff's First Request for Information; prepared email memo to Emily Childress and included suggested edits and rationale for making these edits | DRT | 1.80 |
| 10/11/23 | Reviewed numerous documents and other information provided by client; prepared answers to five (5) of the Questions contained in the PSC Staff's First Request for Information | DRT | 1.10 |
| 10/11/23 | Reviewed email memo from Shaun re Non-Recurring Charges; reviewed draft response of Shaun to Question 37 and the Cost Justification Sheets for the Non-Recurring Charges | DRT | 0.50 |
| 10/11/23 | Reviewed email memo from Emily Childress re Question 24 to PSC Staff's First request for Information; reviewed draft response to Question 24; prepared email memo to Emily Childress with suggested edits to response | DRT | 0.30 |
| 10/11/23 | Researched information about District's participation in Ky. Deferred Compensation Program and verified that the District does not make any contributions on behalf of employees; prepared email memo to Emily Childress and forwarded this information to her | DRT | 0.50 |
| 10/11/23 | Conferred with Emily Childress in a very long telephone call to | DRT | NO CHARGE |

Keep this copy for your records.

| <u>Date</u> | <u>Description</u> | <u>Tkpr</u> | <u>Hours</u> |
|-------------|---|-------------|--------------|
| | discuss proposed answers to many of the Questions contained in PSC Staff's First Request for Information; discussed proposed Exhibits and Attachments to the Response; prepared memo to file | | |
| 10/11/23 | Conferred with D. Talley re preparing revising some of the narrative answerers contained in the draft version of the Response to PSC Staff's First Request for Information | ES | 0.60 |
| 10/11/23 | Reviewed and revised several narrative answers prepared by client to PSC Staff's First Request for Information; prepared additional narrative answers to be included in Response to PSC Staff's First Request for Information; reviewed and revised numerous attachments and exhibits which will be included in Response to PSC Staff's First Request for Information | ES | 5.30 |
| 10/11/23 | Prepared narrative answers to some of the questions to include in the Response to PSC Staff's First Request for Information; reviewed and revised the draft answers | GEW | 2.10 |
| 10/12/23 | Reviewed revised Exhibits and revised Attachments prepared by Emily Childress; prepared email memo to Emily Childress and approved these revised documents | DRT | 0.50 |
| 10/12/23 | Prepared email memo to client re status of Response to PSC Staff's First request for Information; obtained additional information from client to be included in answering one of the questions in the PSC Staff's First Request for Information; prepared another email memo to client re sending invoices for publication of Customer Notice, Tear Sheets, and Affidavits of Publication from all three (3) newspapers as soon as they are received | DRT | 0.50 |
| 10/12/23 | Reviewed email memo from Hart County News-Herald with attached invoice, Affidavit of Publication, and Tear Sheets of the Customer Notice; prepared reply email memo; prepared email memo to client and forwarded the invoice to it for payment | DRT | 0.40 |
| 10/12/23 | Exchanged numerous email memos with Emily Childress re making revisions to the answer to Question 27 of the Response to PSC Staff's First request for Information; reviewed and approved the revised answer | DRT | 0.30 |
| 10/12/23 | Exchanged additional email memos with Emily Childress re the list of Exhibits and list of Attachments to the Response to PSC Staff's First Request for Information | DRT | NO CHARGE |
| 10/12/23 | Reviewed email memo from Jerry Wuetcher re near "final" version of the Response to PSC Staff's First Request for Information complete with Exhibits and Attachments; reviewed the entire Response and all Exhibits and Attachments; made detailed list of missing or incorrect Exhibits and Attachments; prepared revised answer to two (2) of the responses; prepared lengthy email memo to Jerry Wuetcher detailing the Exhibits and Attachments which need to be revised or added to the Response to PSC Staff's First Request for Information | DRT | 2.50 |
| 10/12/23 | Reviewed and revised Response to PSC Staff's First Request for Information to prepare for filing; reviewed numerous attachments | ES | 0.90 |

Keep this copy for your records.

| <u>Date</u> | <u>Description</u> | <u>Tkpr</u> | <u>Hours</u> |
|-----------------------|--|-------------|--------------------|
| | and inserted them after the appropriate questions | | |
| 10/12/23 | Reviewed and revised some of the narrative answers to the questions contained in the Response to PSC Staff's First Request for Information; assembled documents, including both attachments and exhibits, to be included in the Response to PSC Staff's First Request for Information; prepared Response to PSC Staff's First Request for Information for filing | GEW | 8.50 |
| 10/13/23 | Reviewed and approved the revisions made to the Response to the PSC Staff's First Request for Information; confirmed that all changes to the Attachments have been made by Jerry Wuetcher; prepared email memo to Jerry Wuetcher with instructions to file the Response with the PSC | DRT | 0.70 |
| 10/13/23 | Reviewed PSC Order declaring that there were no deficiencies in the Application and accepting the Application "as filed" on September 29, 2023 | DRT | NO CHARGE |
| 10/13/23 | Prepared email memo to client re filing the Response to the PSC Staff's First Request for Information; forwarded the PSC Order declaring that there were no deficiencies in the Application to client | DRT | 0.20 |
| 10/13/23 | Prepared PSC Transmittal Letter; filed Response to PSC Staff's First Request for Information; uploaded several Excel files to PSC website | GEW | 0.70 |
| 10/17/23 | Conferred with General Manager, Chairman, and Board members concerning status of rate case and next steps; answered their questions re timing and possible Formal Hearing date | DRT | 0.30 |
| Total Services | | | \$23,677.50 |

Summary of Services

| <u>Init</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Rate</u> | <u>Value</u> |
|----------------|-------------------|--------------|-------------|--------------|
| GEW | Wuetcher, G E | 17.90 | 405.00 | 7,249.50 |
| DRT | Talley, D R | 29.60 | 405.00 | 11,988.00 |
| ES | Childress, Emily | 14.80 | 300.00 | 4,440.00 |
| Total Services | | 62.30 | | \$23,677.50 |

TOTAL FEES & DISBURSEMENTS \$23,677.50

Total Current Charges This Matter \$23,677.50