

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

**In the Matter of:**

**ELECTRONIC APPLICATION )**  
**OF OLDHAM COUNTY ) CASE NO. 2023-00252**  
**WATER DISTRICT FOR AN )**  
**ALTERNATIVE RATE )**  
**ADJUSTMENT )**

**RESPONSE OF**  
**OLDHAM COUNTY WATER DISTRICT**  
**TO**  
**COMMISSION STAFF'S POST-HEARING**  
**REQUEST FOR INFORMATION**  
**DATED APRIL 24, 2024**

**FILED: MAY 7, 2024**

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

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**ELECTRONIC APPLICATION )  
OF OLDHAM COUNTY ) CASE NO. 2023-00252  
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**RESPONSE OF OLDHAM COUNTY WATER DISTRICT  
TO COMMISSION STAFF’S POST-HEARING  
REQUEST FOR INFORMATION**

Oldham County Water District (the “District”) submits its Response to Commission Staff’s Post-Hearing Request for Information.

Dated: May 7, 2024

Respectfully submitted,

  
\_\_\_\_\_  
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*Counsel for Oldham County Water District*

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

**In the Matter of:**

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**OF OLDHAM COUNTY ) CASE NO. 2023-00252**  
**WATER DISTRICT FOR AN )**  
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**ADJUSTMENT )**

**CERTIFICATION OF RESPONSE OF OLDHAM COUNTY  
WATER DISTRICT TO COMMISSION STAFF'S  
POST-HEARING REQUEST FOR INFORMATION**

This is to certify that I have supervised the preparation of Oldham County Water District's Response to Commission Staff's Post-Hearing Request for Information. The response submitted on behalf of Oldham County Water District is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Date:     May         7th    , 2024




\_\_\_\_\_  
Russell D. Rose  
Chief Executive Officer  
Oldham County Water District



## 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 May 7, 2024; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

  
Damon R. Talley

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2023-00252**

**Response to Commission Staff's Post-Hearing Request for Information**

**Question No. 1**

**Responding Witness: Russell D. Rose, Chief Executive Officer**

**Q-1. Provide the reference and supporting documentation for Oldham District's unemployment rate relied on in the hearing.**

A-1. The unemployment rate of 2.4% for Oldham County about which Russ Rose testified at the April 19, 2024 hearing was published on Kentucky.gov, in a report entitled "*State Releases County Unemployment Data for December 2021*" on January 27, 2022.

The report can be found at: [kentucky.gov/Pages/Activity-stream.aspx?n=EducationCabinet&prId=543](https://kentucky.gov/Pages/Activity-stream.aspx?n=EducationCabinet&prId=543). Attached as **Attachment PH-1** is the county unemployment rate chart produced by the Kentucky Center for Statistics, which accompanied that report.

# **Attachment PH-1**

## **Kentucky Unemployment Data**

# State releases county unemployment data for December 2021

EDITOR'S NOTE: A link to Kentucky county unemployment rate charts is below.

- County Rate  
([https://content.govdelivery.com/attachments/KYEWDC/2022/01/27/file\\_attachments/2059795/Dec2021CountyCharts.pdf](https://content.govdelivery.com/attachments/KYEWDC/2022/01/27/file_attachments/2059795/Dec2021CountyCharts.pdf))

**FRANKFORT, Ky. (Jan. 27, 2022)** - Unemployment rates fell in 119 counties between December 2020 and December 2021 and remained at 8% in Breathitt County, according to the Kentucky Center for Statistics (KYSTATS), an agency of the Kentucky Education and Workforce Development Cabinet.

Woodford County recorded the lowest jobless rate in the commonwealth at 2.3%. It was followed by **Oldham County 2.4%**; Scott County, 2.5%; Boone and Fayette counties, 2.6%; and Harrison, Jessamine, Logan, Taylor and Todd counties, 2.7% each.

Magoffin County recorded the state's highest unemployment rate at 10.3%. It was followed by Breathitt County, 8%; Elliott County, 7.8%; Martin County, 7%; Carter County, 6.7%; Harlan County, 6.5%; Lewis County, 6.2%; Leslie County, 6%; Floyd County, 5.9%; and Letcher County, 5.8%.

Kentucky's county unemployment rates and employment levels are **not** seasonally adjusted because of small sample sizes. Employment statistics undergo sharp fluctuations due to seasonal events such as weather changes, harvests, holidays and school openings and closings. Seasonal adjustments eliminate these influences and make it easier to observe statistical trends. The comparable, unadjusted unemployment rate for the state was 3.4% for December 2021, and 3.7% for the nation.

Kentucky's seasonally adjusted December 2021 unemployment rate was released on Jan. 20, 2022, and can be viewed at <https://kentucky.gov/Pages/Activity-stream.aspx?n=EducationCabinet&prId=541> (<https://kentucky.gov/Pages/Activity-stream.aspx?n=EducationCabinet&prId=541>).

In that release, Kentucky's statewide unemployment rate and employment levels are adjusted to observe statistical trends by removing seasonal influences such as weather changes, harvests, holidays and school openings and closings. For more information regarding seasonal fluctuations, visit the U.S. Bureau of Labor Statistics at [https://www.bls.gov/cps/cps\\_htgm.htm#why](https://www.bls.gov/cps/cps_htgm.htm#why) ([https://www.bls.gov/cps/cps\\_htgm.htm#why](https://www.bls.gov/cps/cps_htgm.htm#why)).

Unemployment statistics are based on estimates and are compiled to measure trends rather than actually to count people working. Civilian labor force statistics include non-military workers and unemployed Kentuckians who are actively seeking work. They do not include unemployed Kentuckians who have not looked for employment within the past four weeks. The data should only be compared to the same month in previous years.

Learn more about Kentucky labor market information at <https://kystats.ky.gov/KYLMI> (<https://kystats.ky.gov/KYLMI>).

(30)





**KENTUCKY LABOR FORCE ESTIMATES**

Preliminary November 2022

**AREA DEVELOPMENT DISTRICTS**

U.S. Comparable Rate - 3.4%

	CLF	EMP	UNEMP	Nov 22	Oct 22	Nov 21
<b>Statewide</b>	<b>2,043,549</b>	<b>1,967,455</b>	<b>76,094</b>	<b>3.7%</b>	<b>3.9%</b>	<b>3.8%</b>
<b>COUNTY</b>						
<b>BARREN RIVER</b>	<b>138,603</b>	<b>133,479</b>	<b>5,124</b>	<b>3.7%</b>	<b>3.9%</b>	<b>3.4%</b>
ALLEN	8,929	8,597	332	3.7%	3.9%	3.2%
BARREN	17,487	16,778	709	4.1%	4.3%	4.1%
BUTLER	4,985	4,787	198	4.0%	4.3%	3.5%
EDMONSON	4,719	4,502	217	4.6%	5.0%	3.9%
HART	7,387	7,085	302	4.1%	4.2%	3.5%
LOGAN	12,407	11,977	430	3.5%	3.7%	3.0%
METCALFE	3,836	3,671	165	4.3%	4.5%	4.4%
MONROE	4,523	4,371	152	3.4%	3.5%	2.9%
SIMPSON	8,860	8,550	310	3.5%	3.6%	3.3%
WARREN	65,470	63,161	2,309	3.5%	3.8%	3.2%
<b>BIG SANDY</b>	<b>41,753</b>	<b>39,216</b>	<b>2,537</b>	<b>6.1%</b>	<b>6.2%</b>	<b>6.2%</b>
FLOYD	10,901	10,233	668	6.1%	6.3%	6.1%
JOHNSON	6,554	6,145	409	6.2%	6.3%	6.0%
MAGOFFIN	3,266	2,966	300	9.2%	8.9%	10.9%
MARTIN	2,170	1,996	174	8.0%	7.9%	8.0%
PIKE	18,862	17,876	986	5.2%	5.5%	5.2%
<b>BLUEGRASS</b>	<b>419,594</b>	<b>405,823</b>	<b>13,771</b>	<b>3.3%</b>	<b>3.5%</b>	<b>3.2%</b>
ANDERSON	11,955	11,579	376	3.1%	3.4%	3.1%
BOURBON	9,542	9,229	313	3.3%	3.5%	3.2%
BOYLE	12,425	11,927	498	4.0%	4.2%	3.8%
CLARK	17,178	16,588	590	3.4%	3.7%	3.4%
ESTILL	5,145	4,915	230	4.5%	4.7%	4.1%
FAYETTE	174,910	169,559	5,351	3.1%	3.3%	3.0%
FRANKLIN	25,050	24,228	822	3.3%	3.6%	3.4%
GARRARD	7,648	7,358	290	3.8%	4.0%	3.7%
HARRISON	8,780	8,493	287	3.3%	3.6%	2.9%
JESSAMINE	26,498	25,637	861	3.2%	3.5%	3.0%
LINCOLN	9,127	8,679	448	4.9%	5.0%	4.4%
MADISON	47,834	46,185	1,649	3.4%	3.7%	3.2%
MERCER	9,843	9,477	366	3.7%	3.9%	3.7%
NICHOLAS	3,316	3,188	128	3.9%	4.1%	3.5%
POWELL	5,187	4,968	219	4.2%	4.4%	3.8%
SCOTT	30,224	29,314	910	3.0%	3.2%	2.8%
WOODFORD	14,932	14,499	433	2.9%	3.0%	2.6%

Note: Rates are not seasonally adjusted



**KENTUCKY LABOR FORCE ESTIMATES**

Preliminary November 2022

**AREA DEVELOPMENT DISTRICTS**

U.S. Comparable Rate - 3.4%

	CLF	EMP	UNEMP	Nov 22	Oct 22	Nov 21
<b>Statewide</b>	<b>2,043,549</b>	<b>1,967,455</b>	<b>76,094</b>	<b>3.7%</b>	<b>3.9%</b>	<b>3.8%</b>
<b>COUNTY</b>						
<b>BUFFALO TRACE</b>	<b>21,589</b>	<b>20,522</b>	<b>1,067</b>	<b>4.9%</b>	<b>5.1%</b>	<b>4.6%</b>
BRACKEN	3,716	3,573	143	3.8%	3.9%	3.4%
FLEMING	5,942	5,696	246	4.1%	4.5%	4.1%
LEWIS	4,646	4,317	329	7.1%	6.7%	6.3%
MASON	6,489	6,176	313	4.8%	5.1%	4.5%
ROBERTSON	796	760	36	4.5%	4.8%	3.6%
<b>CUMBERLAND VALLEY</b>	<b>81,079</b>	<b>77,241</b>	<b>3,838</b>	<b>4.7%</b>	<b>5.0%</b>	<b>4.3%</b>
BELL	8,097	7,688	409	5.1%	5.3%	4.5%
CLAY	5,071	4,774	297	5.9%	6.1%	5.4%
HARLAN	6,653	6,220	433	6.5%	6.6%	6.8%
JACKSON	4,182	3,955	227	5.4%	5.7%	5.2%
KNOX	10,254	9,706	548	5.3%	5.6%	5.0%
LAUREL	25,870	24,835	1,035	4.0%	4.3%	3.5%
ROCKCASTLE	6,621	6,329	292	4.4%	4.6%	4.0%
WHITLEY	14,331	13,734	597	4.2%	4.5%	3.8%
<b>FIVCO</b>	<b>46,901</b>	<b>44,283</b>	<b>2,618</b>	<b>5.6%</b>	<b>5.6%</b>	<b>5.4%</b>
BOYD	17,115	16,230	885	5.2%	5.2%	4.9%
CARTER	9,579	9,005	574	6.0%	6.2%	6.0%
ELLIOTT	1,821	1,677	144	7.9%	7.4%	7.4%
GREENUP	12,867	12,129	738	5.7%	5.6%	5.5%
LAWRENCE	5,519	5,242	277	5.0%	5.0%	5.0%
<b>GATEWAY</b>	<b>32,595</b>	<b>31,091</b>	<b>1,504</b>	<b>4.6%</b>	<b>4.8%</b>	<b>4.4%</b>
BATH	4,605	4,373	232	5.0%	5.2%	5.0%
MENIFEE	2,298	2,180	118	5.1%	5.5%	5.0%
MONTGOMERY	11,577	11,073	504	4.4%	4.6%	4.4%
MORGAN	4,268	4,080	188	4.4%	4.6%	4.3%
ROWAN	9,847	9,385	462	4.7%	4.9%	4.2%
<b>GREEN RIVER</b>	<b>94,682</b>	<b>90,888</b>	<b>3,794</b>	<b>4.0%</b>	<b>4.2%</b>	<b>3.4%</b>
DAVISS	46,112	44,289	1,823	4.0%	4.1%	3.3%
HANCOCK	3,841	3,680	161	4.2%	5.2%	3.4%
HENDERSON	20,753	20,005	748	3.6%	3.8%	3.4%
MCLEAN	3,977	3,816	161	4.0%	4.4%	3.4%
OHIO	8,838	8,394	444	5.0%	5.2%	4.4%
UNION	5,940	5,682	258	4.3%	4.5%	3.5%
WEBSTER	5,221	5,022	199	3.8%	4.0%	3.5%

Note: Rates are not seasonally adjusted



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Preliminary November 2022

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<b>COUNTY</b>						
<b>KENTUCKY RIVER</b>	<b>29,203</b>	<b>27,418</b>	<b>1,785</b>	<b>6.1%</b>	<b>6.3%</b>	<b>6.0%</b>
BREATHITT	3,187	2,955	232	7.3%	7.5%	8.3%
KNOTT	4,266	3,989	277	6.5%	6.8%	6.1%
LEE	1,973	1,863	110	5.6%	5.5%	4.6%
LESLIE	2,515	2,341	174	6.9%	7.1%	6.8%
LETCHER	6,091	5,699	392	6.4%	6.6%	6.4%
OWSLEY	1,028	952	76	7.4%	7.6%	6.1%
PERRY	7,961	7,552	409	5.1%	5.4%	5.0%
WOLFE	2,182	2,067	115	5.3%	5.3%	4.9%
<b>KIPDA</b>	<b>528,740</b>	<b>511,641</b>	<b>17,099</b>	<b>3.2%</b>	<b>3.5%</b>	<b>4.2%</b>
BULLITT	43,651	42,261	1,390	3.2%	3.4%	5.0%
HENRY	8,266	8,015	251	3.0%	3.3%	3.4%
JEFFERSON	401,893	388,661	13,232	3.3%	3.5%	4.3%
OLDHAM	33,959	32,976	983	2.9%	3.1%	2.9%
SHELBY	26,336	25,558	778	3.0%	3.2%	3.5%
SPENCER	10,749	10,420	329	3.1%	3.3%	4.3%
TRIMBLE	3,886	3,750	136	3.5%	3.6%	3.7%
<b>LAKE CUMBERLAND</b>	<b>82,936</b>	<b>79,438</b>	<b>3,498</b>	<b>4.2%</b>	<b>4.4%</b>	<b>3.7%</b>
ADAIR	7,278	6,937	341	4.7%	4.9%	3.7%
CASEY	6,619	6,371	248	3.7%	3.8%	3.3%
CLINTON	3,868	3,698	170	4.4%	4.4%	3.8%
CUMBERLAND	3,369	3,268	101	3.0%	3.1%	2.8%
GREEN	5,330	5,160	170	3.2%	3.4%	3.1%
MCCREARY	4,894	4,656	238	4.9%	5.2%	4.4%
PULASKI	25,709	24,593	1,116	4.3%	4.6%	4.0%
RUSSELL	5,978	5,654	324	5.4%	5.4%	4.4%
TAYLOR	12,906	12,473	433	3.4%	3.7%	3.1%
WAYNE	6,985	6,628	357	5.1%	5.4%	4.2%
<b>LINCOLN TRAIL</b>	<b>121,799</b>	<b>117,167</b>	<b>4,632</b>	<b>3.8%</b>	<b>4.0%</b>	<b>4.1%</b>
BRECKINRIDGE	7,888	7,525	363	4.6%	4.8%	4.5%
GRAYSON	10,508	10,047	461	4.4%	4.5%	4.6%
HARDIN	47,076	45,249	1,827	3.9%	4.1%	4.0%
LARUE	5,764	5,527	237	4.1%	4.4%	4.1%
MARION	9,136	8,841	295	3.2%	3.3%	3.7%
MEADE	11,619	11,137	482	4.1%	4.4%	4.7%
NELSON	23,723	22,951	772	3.3%	3.4%	4.0%
WASHINGTON	6,085	5,890	195	3.2%	3.4%	3.3%

Note: Rates are not seasonally adjusted



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Preliminary November 2022

**AREA DEVELOPMENT DISTRICTS**

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<b>COUNTY</b>						
<b>NORTHERN KENTUCKY</b>	<b>239,783</b>	<b>231,982</b>	<b>7,801</b>	<b>3.3%</b>	<b>3.4%</b>	<b>3.1%</b>
BOONE	70,968	68,745	2,223	3.1%	3.3%	2.9%
CAMPBELL	49,837	48,225	1,612	3.2%	3.4%	3.1%
CARROLL	5,509	5,334	175	3.2%	3.3%	3.1%
GALLATIN	3,946	3,803	143	3.6%	3.8%	3.4%
GRANT	11,492	11,079	413	3.6%	4.0%	3.5%
KENTON	86,283	83,460	2,823	3.3%	3.4%	3.2%
OWEN	4,928	4,753	175	3.6%	3.7%	3.3%
PENDLETON	6,820	6,583	237	3.5%	3.7%	3.2%
<b>PENNYRILE</b>	<b>79,526</b>	<b>75,928</b>	<b>3,598</b>	<b>4.5%</b>	<b>4.7%</b>	<b>4.3%</b>
CALDWELL	5,918	5,706	212	3.6%	3.7%	3.3%
CHRISTIAN	24,842	23,691	1,151	4.6%	4.8%	4.7%
CRITTENDEN	3,712	3,561	151	4.1%	4.2%	3.3%
HOPKINS	17,515	16,761	754	4.3%	4.5%	4.4%
LIVINGSTON	3,560	3,395	165	4.6%	4.7%	4.9%
LYON	2,941	2,813	128	4.4%	4.5%	3.4%
MUHLENBERG	9,499	8,927	572	6.0%	6.3%	5.4%
TODD	5,455	5,272	183	3.4%	3.6%	2.9%
TRIGG	6,084	5,802	282	4.6%	4.5%	3.8%
<b>PURCHASE</b>	<b>84,766</b>	<b>81,337</b>	<b>3,429</b>	<b>4.0%</b>	<b>4.2%</b>	<b>3.7%</b>
BALLARD	3,398	3,247	151	4.4%	4.7%	4.3%
CALLOWAY	16,733	16,055	678	4.1%	4.2%	3.5%
CARLISLE	2,190	2,115	75	3.4%	3.5%	3.2%
FULTON	2,032	1,941	91	4.5%	4.6%	3.9%
GRAVES	15,430	14,804	626	4.1%	4.2%	3.4%
HICKMAN	1,651	1,583	68	4.1%	4.2%	3.5%
MCCRACKEN	29,234	28,073	1,161	4.0%	4.2%	4.0%
MARSHALL	14,098	13,519	579	4.1%	4.1%	3.7%
<b>BOWLING GREEN MSA</b>	<b>84,103</b>	<b>81,047</b>	<b>3,056</b>	<b>3.6%</b>	<b>3.9%</b>	<b>3.3%</b>
<b>ELIZABETHTOWN MSA</b>	<b>64,459</b>	<b>61,913</b>	<b>2,546</b>	<b>3.9%</b>	<b>4.2%</b>	<b>4.2%</b>
<b>LEXINGTON MSA</b>	<b>273,284</b>	<b>264,826</b>	<b>8,458</b>	<b>3.1%</b>	<b>3.3%</b>	<b>3.0%</b>
<b>LOUISVILLE MSA</b>	<b>681,825</b>	<b>661,054</b>	<b>20,771</b>	<b>3.0%</b>	<b>3.3%</b>	<b>3.7%</b>
<b>OWENSBORO MSA</b>	<b>53,930</b>	<b>51,785</b>	<b>2,145</b>	<b>4.0%</b>	<b>4.2%</b>	<b>3.3%</b>

Note: Rates are not seasonally adjusted

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2023-00252**

**Response to Commission Staff's Post-Hearing Request for Information**

**Question No. 2**

**Responding Witnesses: Russell D. Rose and Lacey Cunningham, Finance and Administrative Manager**

**Q-2. Provide any copies of Oldham District's employee(s) annual and exit interviews for the years 2019, 2020, 2021, 2022, 2023, and 2024.**

A-2. The Exit Interviews for the years 2019 through 2024 are provided in **Attachment PH-2**. The Employee Evaluations for the same time period are provided in **Exhibit PH-2**, which is being filed separately due to the size of the file.

# **Attachment PH-2**

## **Oldham District Exit Interviews**

Oldham Co. Water District  
Exit Interview

Employee \_\_\_\_\_

Date 2/22/2019

Position \_\_\_\_\_

Final day worked 2/22/2019

Conducted by \_\_\_\_\_

1. What circumstances prompted you to leave your current position?

**New Career-Police Academy**

2. Did you feel you had the tools, resources and working conditions to be successful in your role? If not, which areas could be improved and how?

**Communication/decision making could be improved. More direct communication.**

3. Do you feel you had the necessary training to be successful in your role? If not, how could it have been better?

**Yes**

4. What was the best part of your job here?

**Learning experience**

5. What did you dislike most about your job here?

**Communication-all levels**

6. What skills and qualifications do you think we need to look for in your replacement?

**Knowledge of what tools do and willing to learn and want to be here.**

7. Excluding pay, did you feel that your benefits were good?

**Yes**

8. Do you have any concerns about the company you'd like to share?

--

9. Is there anything else you'd like to add?

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Oldham Co. Water District  
Exit Interview

Employee \_\_\_\_\_ Date 5/15/2019

Position \_\_\_\_\_ Final day worked 5/15/2019

Conducted by \_\_\_\_\_

1. What circumstances prompted you to leave your current position?

**Family-retirement**

2. Did you feel you had the tools, resources and working conditions to be successful in your role? If not, which areas could be improved and how?

**Adequate**

3. Do you feel you had the necessary training to be successful in your role? If not, how could it have been better?

**Yes**

4. What was the best part of your job here?

**Freedom**

5. What did you dislike most about your job here?

**The way we mow and some equipment.**

6. What skills and qualifications do you think we need to look for in your replacement?

**Hard worker, initiative, and work with inmates**

7. Excluding pay, did you feel that your benefits were good?

**Very**

8. Do you have any concerns about the company you'd like to share?

9. Is there anything else you'd like to add?





Oldham Co. Water District  
Exit Interview

Employee \_\_\_\_\_ Date 4/14/2022

Position \_\_\_\_\_ Final day worked 4/14/2022

Conducted by \_\_\_\_\_

1. What circumstances prompted you to leave your current position?  
**Wrote up for hat deemed inappropriate. Unhappy since [redacted] was fired and no one said why. Nothing job related-like where he parks truck. Also made less money in 2021 compared to 2022 due to removing on call pay. He is not the only one unhappy about that.**
2. Did you feel you had the tools, resources and working conditions to be successful in your role? If not, which areas could be improved and how?  
**Somewhat- when you want something fixed-should listen to like testing meters. He wanted to purchase new meters in oct 2018 to start testing in 2019. We didn't purchase until mid 2020- already 2000 meters behind.**
3. Do you feel you had the necessary training to be successful in your role? If not, how could it have been better?  
**Yeah- no real training, he took that over**
4. What was the best part of your job here?  
**People he worked with**  
**Dealing with customers-his favorite part**
5. What did you dislike most about your job here?  
**The policies-not actually work related**
6. What skills and qualifications do you think we need to look for in your replacement?  
**Good at math and detailed with paperwork**
7. Excluding pay, did you feel that your benefits were good?  
**Yeah**
8. Do you have any concerns about the company you'd like to share?  
**Afraid for us that the next person will mess up paperwork**  
**Morale-not sure how to fix**
9. Is there anything else you'd like to add?  
**[redacted] may not see it because if you ask they will say they are fine but there are complaints**

**OLDHAM COUNTY WATER DISTRICT****CASE NO. 2023-00252****Response to Commission Staff's Post-Hearing Request for Information****Question No. 3****Responding Witness: Lacey Cunningham**

**Q-3. Provide data for how many of Oldham District's customers pay online and how many pay in cash or check per month for the preceding 12 months from the service date of this request.**

A-3. Please see the table below for the data on how many of Oldham District's customers paid via online and via check or cash from April 2023 to March 2024:

<b>Oldham County Water District Customer Receipts by Type</b>			
	<b>Check or</b>		
	<b>Online</b>	<b>Cash</b>	<b>Total</b>
Apr-23	6,059	2,116	8,175
May-23	6,583	2,447	9,030
Jun-23	6,823	2,482	9,305
Jul-23	6,644	2,343	8,987
Aug-23	6,833	2,187	9,020
Sep-23	6,959	2,213	9,172
Oct-23	6,878	2,240	9,118
Nov-23	7,399	2,124	9,523
Dec-23	7,089	2,067	9,156
Jan-24	6,910	2,281	9,191
Feb-24	7,828	2,028	9,856
Mar-24	6,879	1,867	8,746

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2023-00252**

**Response to Commission Staff's Post-Hearing Request for Information**

**Question No. 4**

**Responding Witness: Russell D. Rose**

**Q-4. Refer to Oldham District's response to Commission Staff's First Request for Information, Item 6, in which Oldham District stated, "I believe this idea was first suggested by a former PSC Commissioner." Confirm that the former Commissioner's recommendation was incorporated into a Commission Order and provide a reference for that Order. If not confirmed, provide any documentation substantiating this recommendation.**

A-4. The concept of increasing an employee's wages by an amount sufficient to enable the employee to pay a significant portion (i.e., the BLS national average percentage) of the cost of the health insurance premiums, while still "netting" the same take home pay, was discussed by former Commission Vice Chairman Robert Cicero on at least two (2) occasions where I was present. The first time was when Vice Chairman Cicero spoke at the KRWA Annual Conference in Lexington, Kentucky on August 29, 2017. The second time was at a Water Law Seminar co-sponsored by KRWA & Stoll Keenon Ogden in Bowling Green, Kentucky.

**KRWA Annual Conference.** Vice Chairman Cicero was one of the featured speakers at the 2017 KRWA Annual Conference. During his speech, as I recall, he discussed the Commission's Orders about the importance of an employee paying a significant portion of the cost of his or her health insurance premiums. During the question and answer session which followed, he remarked that one solution was to simply increase the amount of the employee's wages in a sufficient amount so the employee could pay a significant portion of the cost of the health insurance premiums and still "net" the same amount after payment of income taxes and payroll taxes on the increased amount of wages. He did not seem to express concern about the actual cost of the health insurance plan, the specific

benefits of the plan, or the amount of the employee's wages. The most important factor was that an employee should contribute a significant portion of the cost of the insurance premiums.

**Water Law Seminar.** Vice Chairman Cicero was not a scheduled speaker at the Water Law Seminar, but he attended to monitor the training session on behalf of the Commission. At one point, one of the speakers asked Vice Chairman Cicero if he wished to make any comments. Vice Chairman Cicero then spoke for a few minutes, fielded some questions, and made essentially the same recommendation or suggestion that he had made at the KRWA Annual Conference. I do not recall the year when he attended the Water Law Seminar.

To the best of my knowledge, former Vice Chairman Cicero's recommendation or suggestion was never incorporated into a Commission Order.

**OLDHAM COUNTY WATER DISTRICT**

**CASE NO. 2023-00252**

**Response to Commission Staff's Post-Hearing Request for Information**

**Question No. 5**

**Responding Witness: Russell D. Rose**

**Q-5. For Oldham District's employee health plans, confirm whether there is a cap on benefits for chronic or long-term health conditions. If so, provide the cap amount by type of coverage plan.**

A-5. Oldham District's employees are offered one type of coverage plan, Anthem Blue Access PPO HSA Option E1 with Rx Option T5. The Certificate of Coverage document associated with this health plan is filed separately as **Exhibit PH-5**. According to the Certificate of Coverage document, "Essential Health Benefits" are not subject to lifetime or annual dollar maximums. *See Exhibit PH-5* at 14.

Essential Health Benefits are defined by federal law, and refer to benefits in at least the following ten categories:

1. Ambulatory patient services;
2. Emergency services;
3. Hospitalization;
4. Maternity and newborn care;
5. Mental health and substance use disorder services, including behavioral health treatment;
6. Prescription drugs;
7. Rehabilitative and habilitative services and devices;
8. Laboratory services;
9. Preventative and wellness services and chronic disease management; and
10. Pediatric services including oral and vision care.

Certain non-essential health benefits are subject to either a lifetime or dollar maximum. However, any benefits related to chronic or long-term health conditions are likely to fall within category number nine—preventative and wellness services and chronic disease management—and thus, upon review of **Exhibit PH-5** and based on Oldham District’s reasonable belief, these benefits are not subject to a monetary cap.