COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONICAPPLICATION OF ROWAN WATER, INC. FOR APPROVAL OF WATER TRAINING	))	**CASE NO. 2023-00370**

NOTICE OF FILING

Comes now Rowan Water, Inc., its individual directors and its general manager (collectively, "Rowan Water"), and Honaker Law Office, PLLC ("Joint Applicants") to give notice of the filing of the following documents:

1. A sworn statement attending that the accredited instruction entitled "**Rowan Water Director Training Session 1I"** was performed on January 10, 2024 (Exhibit 1).
2. There were minor editing changes made to the materials proposed as curriculum filed with the Commission and an agenda, and a copy of the final edited presentations provided in paper form to the attendees is attached as Exhibit 2.
3. The name of each attending water association director, and the number of hours that they attended is attached as Exhibit 3.
4. All directors attended in person.
5. The only written materials provided the attendees were copies of the agenda and the presentations provided in Exhibit 2.

Dated this 16th day of January, 2024.

Respectfully submitted,

Brittany Hayes Koenig

L. Allyson Honaker
Brittany Hayes Koenig
HONAKER LAW OFFICE, PLLC
1795 Alysheba Way, Suite 6202
Lexington, Kentucky 40509
(859) 368-8803
allyson@hloky.com
brittany@hloky.com

Counsel for Rowan Water, Inc.

CERTIFICATE OF SERVICE

This is to certify that foregoing was submitted electronically to the Commission on January 16, 2024 and that there are no parties that have been excused from electronic filing. Pursuant to prior Commission orders, no paper copies of this filing will be submitted.

Brittany Hayes Koenig
Counsel for Rowan Water, Inc.

Exhibit 1

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF FAYETTE)

AFFIDAVIT

Brittany Hayes Koenig of Honaker Law Office, PLLC, Counsel for Rowan Water, Inc., being duly sworn, states that:

1. She has served as organizer and presenter of the water training program entitled **"Rowan Water Director Training Session I1"** in the above-referenced case.

2. **"Rowan Water Director Training Session I1"** was held on January 10, 2024, at the offices of Rowan County Water Association, 1765 Christy Creek Road, Morehead, Kentucky 40351.

3. The presentations listed in the proposed agenda submitted to the Kentucky Public Service Commission in this matter were conducted for the length of time specified, a total of 3 hours of instruction.

4. Each attendee was provided in paper medium a copy of the presentations and program agenda.

Brittany Hayes Koenig
HONAKER LAW OFFICE, PLLC
1795 Alysheba Way, Suite 6202
Lexington, Kentucky 40509
(859) 489-4667
brittany@hloky.com

The foregoing Verification was signed, acknowledged and sworn to before me this 12th day of January, 2024, by Brittany Hayes Koenig of Honaker Law Office, PLLC, Counsel for Rowan Water, Inc..

Notary Commission No. KYNP 76727

Commission expiration: 8/2/27

LEIGH ALLYSON PREECE HONAKER · NOTARY PUBLIC · Comm. # KYNP76727 · MY COMM. EXP. 8/2/2027 · COMMONWEALTH OF KENTUCKY

Exhibit 2

Rowan Water Director Training II

Presented by Rowan Water, Inc. and Honaker Law Office, PLLC

1765 Christy Creek, Morehead, Kentucky 40351

December 2023/January 2024. Session 2

10-10:15am	**Board Registration and Welcome**
10:15-10:45am	**Regulatory Compliance II-Board & Rate Cases (1 hour)**
11:15-11:45pm	**Commission Orders & Updates II (.5 hour)**
11:45-12:45pm	**Lunch**
12:45-1:45pm	**Regulatory Compliance II-Tariffs & CPCN (1 hour)**
1:45-2:15pm	**Regulatory Compliance Goals (.5 hour)**

HONAKER LAW OFFICE, PLLC

ROWAN WATER DIRECTOR TRAINING II

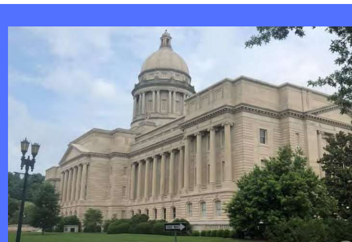
PRESENTATION BY BRITTANY HAYES KOENIG

INTRODUCTION & DISCLAIMER

BRITTANY HAYES KOENIG

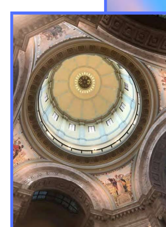
REGULATORY COMPLIANCE II

BOARD & RATE CASES



AGENDA

- BOARD RESPONSIBILITY
- RATE CASE CONSIDERATION



COMMISSIONERS ARE RESPONSIBLE FOR ENSURING THAT THE WATER UTILITY COMPLIES WITH THE LAWS OF THE COMMONWEALTH AND COMMISSION REGULATIONS

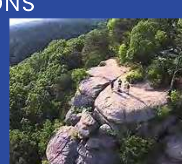
Water District Commissioners

KRS 74.020: WATER DISTRICT IS ADMINISTERED BY BOARD OF COMMISSIONERS OR BOARD OF DIRECTORS WHO MANAGE THE AFFAIRS OF THE DISTRICT

KRS 74.070: DUTIES AND POWERS

WATER ASSOCIATIONS

KRS 273.215 CONTAINS STANDARDS FOR DIRECTORS: GOOD FAITH; INFORMED BASIS; BEST INTEREST OF CORPORATION. KRS 273.219 IS THE CONFLICT OF INTEREST PROVISION WITH FOCUS ON DISCLOSURE AND FAIRNESS



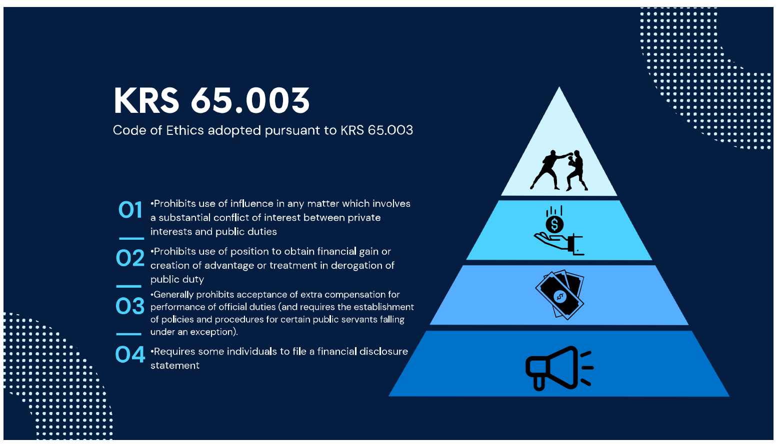
PENALTIES

KRS 278.990(1): Any officer, agent, or employee of a utility and any other person who willfully violates any of the provisions of this chapter or any regulation [promulgated by the commission], or fails to obey any order of the commission . . . , or who procures, aids, or abets a violation by any utility, shall be subject to either a civil penalty to be assessed by the commission not to exceed two thousand five hundred dollars ($2,500) for each offense.

KRS 278.990(3): Any utility that issues any securities or evidences of indebtedness, or assumes any obligation or liability in respect to the securities or evidences of indebtedness of any other person, or makes any sale or other disposition of securities or evidences of indebtedness, or the proceeds thereof, for purposes other than the purposes specified in the order of the commission made with respect thereto under KRS 278.300, shall be fined not more than ten thousand dollars ($10,000).

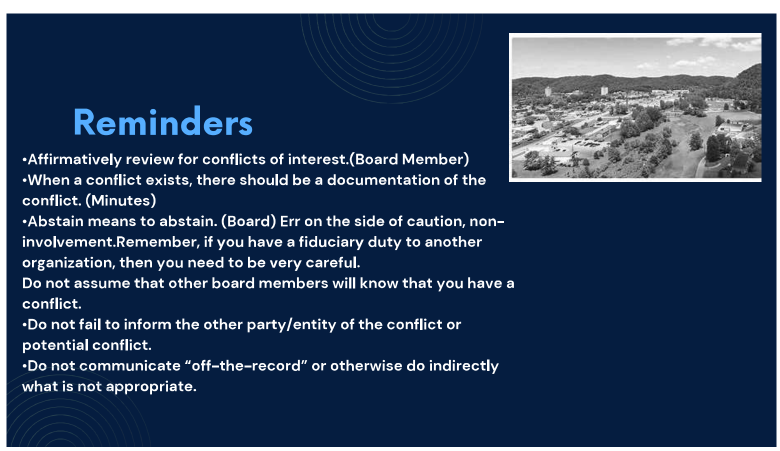

"ETHICS" IS MANDATORY
KRS 65.003
•requires the governing body of each county to adopt, by ordinance, a code of ethics that applies to all elected officials. The boards, officers, and employees of special purpose governmental entities "shall" be subject to a code of ethics.
KRS 65A.070(2)
permits the governing body of a special purpose governmental entity to adopt ethics provisions that are more stringent than adopted by the establishing entity (the code of ethics of the county in which the principal business office is located).


STATUTORY STANDARDS
KRS 11A.005
•Independent and impartial actions
•Policy and decision through established processes
•No use of position for private benefits
•Enforcement (KRS 11A.080)
KRS 65.003
•Disclosure of financial interests
•Operate with clear standards of conduct
•Have policy on employment of family members


KRS 65.003
Code of Ethics adopted pursuant to KRS 65.003
01 •Prohibits use of influence in any matter which involves a substantial conflict of interest between private interests and public duties
02 •Prohibits use of position to obtain financial gain or creation of advantage or treatment in derogation of public duty
03 •Generally prohibits acceptance of extra compensation for performance of official duties (and requires the establishment of policies and procedures for certain public servants falling under an exception).
04 •Requires some individuals to file a financial disclosure statement


Gifts
(including travel and travel-related expenses)
Nepotism
Use of public property, equipment, and personnel
Post-employment restrictions
Misuse of confidential information
Representation of interests before governmental unit
Honoraria (extra compensation)
Conflict of interest generally with emphasis on maintaining the proper discharge of public duties
Conflicts of interest, specifically, in contracts
Code of Ethics Addresses...


KRS 65A.070(2)
•Additional policy of water district includes, among other things, prohibitions against:
•Gambling or money lending on site
•Intoxication from alcohol or drugs
•Sexual harassment of a fellow employee
Note: While these seem to be the type of things covered by an employee handbook, it underscores that ethical behavior is not separate or distinct from correct performance of the job.


Reminders
•Affirmatively review for conflicts of interest.(Board Member)
•When a conflict exists, there should be a documentation of the conflict. (Minutes)
•Abstain means to abstain. (Board) Err on the side of caution, non-involvement.Remember, if you have a fiduciary duty to another organization, then you need to be very careful.
Do not assume that other board members will know that you have a conflict.
•Do not fail to inform the other party/entity of the conflict or potential conflict.
•Do not communicate "off-the-record" or otherwise do indirectly what is not appropriate.

MINUTES

Official Record

- *Record Adherence to Open Meetings Rules*
- *Record Due Diligence (PSC Orders, water loss, rate sufficiency reviews)*
- *Record Attendance-Recusal if Conflict*
- *Record as a public record because they will most likely be filed in a rate case at some point.*

SELF DEALING

Board Members/Directors cannot use the utility to promote private gain and personal enrichment.

When the action involves the personal interest or private gain of a commissioner, an officer or director, there is a conflict of interest.

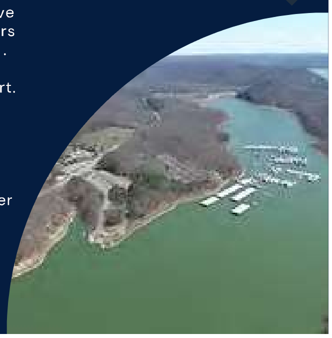
Both the members of the boards and boards as bodies must be diligent to prevent conflicts of interest from interfering with the management of the utility.

Board Member Compensation

KRS 74.020(6): Each commissioner shall receive an annual salary of not more than thirty-six hundred dollars ($3,600), which shall be paid out of the water district fund. Except that . . . each commissioner who completes . . . a minimum of six (6) instructional hours of water district management training . . . may receive an annual salary of not more than six thousand dollars ($6,000) to be paid out of the water district fund . . . the salary shall be fixed by the county judges/executive with the approval of the fiscal court.

KRS 74.050: In addition to the compensation for commissioners as set out in KRS 74.020, as compensation for his or her services the treasurer shall receive an amount fixed by the [Water District Board], not to exceed two hundred dollars ($200) per year.

KRS 74.020(3): A commissioner who participates in any official action by the water district board of commissioners which results in a direct financial benefit to him may be removed from office . . .



BOARD MEMBER COMPENSATION

Case No. 2019-00268: FACTS

- Water District with about 3,000 customers filed for a rate increase pursuant to the alternative rate filing procedure in 807 KAR 5:076.
- Water Commissioners were receiving $6,000 pursuant to KRS 74.020(6) and were being offered health, dental, vision, and life insurance benefits at the same level as the districts full time employees.
- The total compensation for water commissioners was $71,023.84, $80,714.42, and $68,740.44 in 2017, 2018, and 2019.
- The Commission found that the water commissioners had voted to approve the healthcare for themselves.

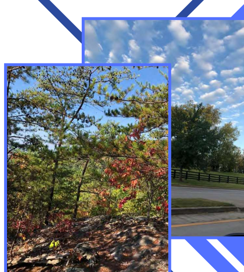
Case No. 2019-00268: DECISION & RESOLUTION

- The Commission held that any board member who voted to provide themselves insurance violated KRS 74.030 by participating in an official act that result in their direct financial benefit and that they could be removed from office.
- The Commission also held that the KRS Chapter 74 intended to specifically limit the compensation of water Commissioners to the amounts specifically authorized by KRS Chapter 74 i.e. $6,000 for commissioners and an additional $200.00 for the treasurer.
- The Commission ordered the district to cease offering compensation to the board beyond those amounts.
- The board members who voted to provide themselves the health insurance and other benefits resigned from the board.

Rates

KRS 278.010(12)

ANY INDIVIDUAL OR JOINT FARE, TOLL, CHARGE, RENTAL, OR OTHER COMPENSATION FOR SERVICE RENDERED OR TO BE RENDERED BY ANY UTILITY, AND ANY RULE, REGULATION, PRACTICE, ACT, REQUIREMENT, OR PRIVILEGE IN ANY WAY RELATING TO SUCH FARE, TOLL, CHARGE, RENTAL, OR OTHER COMPENSATION, AND ANY SCHEDULE OR TARIFF OR PART OF A SCHEDULE OR TARIFF THEREOF.



RATES

METHODS FOR SETTING AND ADJUSTING RATES

- *TARIFF FILING*
- *ALTERNATIVE RATE ADJUSTMENT*
- *PURCHASE WATER ADJUSTMENT*
- *NON-RECURRING CHARGES*

WHAT IS A RATE CASE

• THERE IS A DIFFERENCE BETWEEN FILING A BASE RATE CASE FOR AN INCREASE IN RATES PURSUANT TO KRS 278.190 OR THROUGH THE 807 KAR 5:076 ALTERNATIVE RATE ADJUSTMENT PROCEDURE FOR SMALL UTILITIES VERSUS WHEN A UTILITY FILES FOR APPROVAL OF A LOAN APPROVAL FOR UNITED STATES DEPARTMENT OF AGRICULTURE RURAL DEVELOPMENT (USDA/RD) PROJECT PURSUANT TO KRS 278. 023.

• DEPRECIATION IS NOT ACCOUNTED FOR IN USDA/RD LOANS THE SAME AS PSC.

WATER LOSS

• *CASE NO. 2019-00041, ELECTRONIC INVESTIGATION INTO EXCESSIVE WATER LOSS BY KENTUCKY'S JURISDICTIONAL WATER UTILITIES (KY. PSC NOV. 22, 2019), APPENDIX L, CONFRONTING THE PROBLEMS PLAGUING KENTUCKY'S WATER UTILITIES: AN INVESTIGATIVE REPORT BY THE KENTUCKY PUBLIC SERVICE COMMISSION NOVEMBER 2019.*

• *FINDINGS AND RECOMMENDATIONS*

WATER USE & LOSS CALCULATIONS FORM:

PSC Case No. 2018-00394

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

For the Month of: January Year:

LINE #	ITEM	GALLONS (Omit 000's)
1	**WATER PRODUCED AND PURCHASED**	
2	Water Produced	
3	Water Purchased	
4	**TOTAL PRODUCED AND PURCHASED**	-
5		
6	**WATER SALES**	
7	Residential	
8	Commercial	
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain)	
14	**TOTAL WATER SALES**	-
15		
16	**OTHER WATER USED**	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	
20	Fire Department	
21	Other Usage (explain)	
22	**TOTAL OTHER WATER USED**	-
23		
24	**WATER LOSS**	
25	Tank Overflows	
26	Line Breaks	
27	Line Leaks	
28	Excavation Damages	
29	Theft	
30	Other Loss (explain)	
31	**TOTAL WATER LOSS**	-
32		
33	**Note:** Line 14 + Line 22 + Line 31 **MUST** Equal Line 4	
34		
35	**WATER LOSS PERCENTAGE**	
36	(Line 31 divided by Line 4)	0.00%

Commission Form Instructions:

Line #		
		Water Produced and Purchased
	All Lines	Omit the last three zeros into the cell.
	2	Provide the number of thousands of gallons of water produced by the utility for the corresponding month.
	3	Provide the number of thousands of gallons of water purchased by the utility from third-parties for the corresponding month.
	4	The total of Water Produced and Water Purchased. This row will automatically calculate if the preceding lines are correctly filled out.
		Water Sales
	7-13	Provide the number of thousands of gallons of water sold for each category listed.
	12	Sales to Public Authorities are typically sold under a special contract or tariff (e.g.fire department or other governmental entity.)
	13	If there are water sales for categories other than the ones listed in Lines 7-12 above, provide the thousands of gallons of water sold for "Other Sales" and an explanation that details the water sale. If an explanation is not given, the form will not calculate Line 14, and instead, will give an error message. The majority of the water sales should fall into the categories in Lines 7-12, such that most utilities will enter "0" into the "Other Sales" line.
	14	The sum of Lines 7-13 should match the amount of "Total Water Sales" in this row. This row will automatically calculate if the preceding lines are correctly filled out.
		Other Water Used
	17-21	These categories include water that is properly used but not sold and, therefore, does not generate revenue for the utility. All gallons of water that are reported in these categories should be supported by records to be kept at the utility's office, which will be subject to examination by the Division of Inspections.
	17	Provide the thousands of gallons of water used solely for the purpose of the utility and/or water treatment use. This would include, for example, backwashing the filtration system of the water treatment plant.
	18	Provide the thousands of gallons of water used for wastewater use. This would include, but would not be limited to, for example, water used to wash down/clean the wastewater plant.
	19	Provide the thousands of gallons of water used for system flushing, which is typically water used to keep water fresh and chlorine residuals up, and water used to flush lines to protect from Total Trihalomethanes (known as TTHM) and Haleacetic acids (known as HAA).
	20	Provide the thousands of gallons of water used by the Fire Department that are not provided in "Sales to Public Authorities" in Line 12. Only enter gallons for "Fire Department" use if the water is provided at no cost pursuant to the utility's tariff. All sales to fire departments should be entered in the sales category above. Pursuant to the requirements of KRS 278.170(3) and 807 KAR 5:095, Section 9(1), a utility that permits a fire department to use water at no charge or at reduced rates shall require the fire department to submit quarterly reports demonstrating its water usage. 807 KAR 5:095, Section 9(2), further requires a utility to include a penalty in its tariff for any fire department's failure to submit the required reports.
	21	If there are categories of legitimate, cost-free water usage other than the ones listed in Lines 17-20 above, provide the thousands of gallons of water used for "Other Usage" and an explanation that details what was used. If an explanation is not given, the form will not calculate Line 22, and instead, will give an error message. The majority of legitimate usage should fall into the categories on Lines 17-20, such that most utilities will enter "0" into the "Other Usage" line.
	22	The sum of Lines 17-21 should match the amount of "Total Other Water Used" in this row. This row will automatically calculate if the preceding lines are correctly filled out.
		Water Loss
	25-30	All gallons of water reported for these lines represent all other water that is not billed or used in the production and transmission of water to customers. Any amounts included in these lines are part of the calculation of the Water Loss Percentage below. The utility should be prepared to support any amounts that appear in Lines 25-29 with records kept at the utility's office, which will be subject to examination by the Division of Inspections.
	28	Water reported in this category only includes water lost for excavation damages for which the water was neither billed, nor collected from the responsible party. If the amounts for excavation damages are recovered from the responsible party, these amounts should be reported in water sales.
	29	Water reported in this category only includes water lost for theft that was neither billed, nor collected from the customer. The water loss can be estimated by using the average monthly use for each class of customer. If amounts for water theft are recovered from the customer, these amounts should be reported in water sales.
	30	If there is water loss for categories other than those listed in Lines 25-29 above, provide the thousands of gallons of water loss for "Other Loss" and an explanation that details the specific water loss. If an explanation is not given, the form will not calculate Line 31, and instead, will give an error message. This would include, but not be limited to, malfunctioning meters, unknown loss, etc. The majority of the water loss should fall into the categories in Lines 25-29, such that most utilities will enter "0" into the "Other Loss" line.
	31	The sum of Lines 25-30 should match the amount of "Total Water Loss" in this row. This row will automatically calculate if the preceding lines are correctly filled out.
		Water Loss Percentage
	36	The "Water Loss Percentage" in Line 36 will automatically calculate if all other lines on the form are filled out correctly. If the sum of Lines 14, 22, and 31 do not equal Line 4, the form will return an error in red that the Lines do not equal.

RATES

WATER LOSS SURCHARGE REPORTING FORM

Utility Name:
Selected Financial Information and Better / Worse (B / (W)) Performance
Year Ended December 31, ______

A Month	B Record as Sales	C Billings	D Collections	E Deposits	F D - C Collections B / (W) Billings	G E - D Deposits B / (W) Collections (1)	H C - B Billings B / (W) Recorded Sales (1)
January					0.00	0.00	0.00
February					0.00	0.00	0.00
March					0.00	0.00	0.00
April					0.00	0.00	0.00
May					0.00	0.00	0.00
June					0.00	0.00	0.00
July					0.00	0.00	0.00
August					0.00	0.00	0.00
September					0.00	0.00	0.00
October					0.00	0.00	0.00
November					0.00	0.00	0.00
December					0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Specify the general ledger account where the surcharge is recorded ______________________

(1) Explain reasons for difference if amount does not equal zero.

Rate Cases

•There needs to be a reasonable nexus between the spending (expense) and the provision of reasonable service. Read the most recent rate case Order from the Commission and see if there were any expenses disallowed.
•The presentation to the board concerning the budget and expenditures should contain sufficient information to describe and detail the use of funds.
• Candid with Attorneys and Provide the Most Information to Support your Position for Commission Staff
Utility should make their case for the rate they are asking for. PSC doesn't "give money" ratepayers pay.
PSC Staff required to get evidence in the record.
Utilities should have policies that promote clear record keeping to hold the utility accountable to its customers.
Be prepared to spell out procedures and intent very clearly because there is a lot of new Commission Staff with little experience in utility law.
•Commissioners
•"That is the way we've always done it" = NO Excuse.
•Educate yourself on decisions. Ask questions.
•If you employ attorneys, understand that the utility/ratepayers are responsible for paying the fee and you are responsible for managing the direction of litigation costs .

- Address periodic infrastructure
- New York Times Rule: "Don't do wouldn't want to have on the front York Times."
- On the record disclosure to the
- Advice of counsel and/or (wher advisory opinion by ethics board
- On the record removal (recusal
- Local Paper Rule: Would a reaso customer agree that it is fair?

RATES

PURCHASED WATER ADJUSTMENT

KRS 278.015
•ADJUST RATES TO REFLECT WHOLESALE SUPPLIER INCREASE WITHOUT PSC PRIOR APPROVAL

807 KAR 5:068
•FILE APPLICATION WITHIN 20 DAYS OF ADJUSTMENT
•NOTICE TO CUSTOMERS
•FILE REVISED TARIFF SHEET WITHIN 20 DAYS OF COMMISSION ORDER APPROVING PROPOSED RATES

PURCHASED WATER ADJUSTMENT - WATER DISTRICTS & ASSOCIATIONS

Filing Requirements Checklist

(Applicable Authority: KRS 278.012; KRS 278.015; 807 KAR 5:068)

Case No. ___________ Applicant Name ___________________ Received Date ______________ Form Circulation Date ____________

Instructions:
1) Each division noted by checkmark ( ) is to complete its review and pass on within two days of receipt.
2) This form is to list only the specific filing deficiencies as identified in the regulations. If additional information is needed, an information request must be issued.
3) Staff member should use initials and list date review is completed.
4) Return to Docket Section following review by all divisions.

	Reviewed by following Divisions:	Date	Staff Member
________	Filings	________	________
________	Financial Analysis	________	________
________	Legal	________	________

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met: Yes	Requirement Met: No	Waiver Requested	Approve Waiver?: Yes	Approve Waiver?: No
	807 KAR 5:001						
Filings	Section 7(1)	The original and 10 copies of completed application form.					
	807 KAR 5:068						
Financial Analysis	Section 1	(b) A schedule listing current and proposed rates					
Financial Analysis		(c) A copy of the supplier's notice showing a change in supplier's base rate					
Financial Analysis		(d) The calculation and all supporting documents used to determine the change in purchased water costs sufficient to determine the accuracy of the calculation					

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met: Yes	Requirement Met: No	Waiver Requested	Approve Waiver?: Yes	Approve Waiver?: No
Legal		(e) A copy of the resolution or other document of the utility's governing body authorizing the proposed rates					
Legal		~~(f) If the applicant is a water district and proposes to increase any of its rates for service, a statement from an authorized official of the district indicating the date its proposed rate adjustment was reported to the governing body of the county in which the largest number of its customers reside and the date it presented testimony, or is scheduled to present testimony, to that governing body.~~ *****No longer required*****	n/a				
Financial Analysis	Section 4	Satisfactorily completed Purchased Water Adjustment Form 1					

NOT AN INITIAL FILING REQUIREMENT

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met: Yes	Requirement Met: No	Waiver Requested	Approve Waiver?: Yes	Approve Waiver?: No
Legal	Section 5	If a copy of the public notice is included, does it meet the requirements?					

All filings with the Kentucky Public Service Commission which contain personal information must be redacted by the filer pursuant to 807 KAR 5:001 Sec. 4 (10).
Filings which are not in compliance will be rejected.

Section 5
Notice

If a utility has twenty (20) or fewer customers, it shall mail a written notice to each customer no later than the issuance of the first bill at the increased rate.

If a utility has more than twenty (20) customers, it shall provide notice by:

1. Including notice with customer bills mailed no later than the issuance of the first bill at the increased rate;

2. Mailing a written notice to each customer no later than the issuance of the first bill at the increased rate;

3. Publishing notice one (1) time in a prominent manner in a newspaper of general circulation in the utility's service area no later than the issuance of the first bill at the increased rate; or

4. Publishing notice in a trade publication or newsletter delivered to all customers no later than the issuance of the first bill at the increased rate.

A utility that provides service in more than one (1) county may use a combination of the notice methods listed in paragraph (b) of this subsection.

A utility shall file with the commission no later than thirty (30) days from the date of the commission's order approving an adjustment to the utility's rates pursuant to this administrative regulation:

(a) If notice is mailed to its customers, an affidavit from an authorized representative of the utility verifying the contents of the notice, that notice was mailed to all customers, and the date of the mailing;

(b) If notice is published in a newspaper of general circulation in the utility's service area, an affidavit from the publisher verifying the contents of the notice, that the notice was published, and the date of the notice's publication; or

(c) If notice is published in a trade publication or newsletter delivered to all customers, an affidavit from an authorized representative of the utility verifying the contents of the notice, the mailing of the trade publication or newsletter, that notice was included in the publication or newsletter, and the date of mailing.

Each notice shall contain:

1. The effective date;

2. The present rates and proposed rates for each customer classification to which the proposed rates will apply;

3. The amount of the change requested in both dollar amounts and percentage change for each customer classification to which the proposed rates will apply;

4. The amount of the average usage and the effect upon the average bill for each customer classification to which the proposed rates will apply;

5. A statement that a person may examine this application at the offices of (utility name) located at (utility address); and

6. A statement that a person may examine this application at the commission's offices located at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8:00 a.m. to 4:30 p.m., or through the commission's Web site at http://psc.ky.gov.

RATES

NONRECURRING CHARGES

807 KAR 5:011 SECTION 10
•DOCUMENTATION
•COST JUSTIFICATION
•PUBLIC NOTICE
•STATEMENT WHY REVISIONS WERE NOT INCLUDED IN MOST RECENT RATE CASE AND SHOULD NOT BE DEFERRED UNTIL NEXT GENERAL RATE CASE

•ONLY ENOUGH REVENUE TO PAY EXPENSES INCURRED

WATER LOSS PREVENTION PLAN:

COMPONENTS OF A
WATER LOSS PREVENTION PLAN

How do the terms "water loss" and "weight gain" relate? Can it be that apathy, procrastination, or plain idleness might apply to both situations? Definitely, good intentions abound with either problem. No one wants to be overweight, just as no one who is responsible for the management and operation of a water utility wants to have excessive water loss. How do we attack these problems? In either case, we must identify the root of the problem, focus on a solution and stick with it! How many times have we heard the phrase, "If you fail to plan, you plan to fail." A good plan is the key to any long-term solution.

A person's physical and psychological make-up has a huge impact when attempting to solve the weight problem. Heredity affects us in many ways, but especially in regards to our ability to lose weight. What about the person who accepted the position of manager and soon learned that they had inherited an inadequately operated water system?

Age is another common factor in both problems. A water distribution system that was installed in the WPA days of the 1930's will most likely experience problems that newly installed water lines will not possess. The older that I get, the harder it is to keep the weight off! We can list other analogies such as our body shapes and sizes compared to the geographical terrain of our utilities and our distribution system sizes. However, let's get going with a proactive approach to the problem of water loss.

Accurate records are vital to any water loss prevention plan. How do we know the status of our water loss if we do not keep records? There is a water loss template that is available for download from the Kentucky Rural Water Association website (www.krwa.org). This Excel spreadsheet, or a similar record keeping system, can be utilized in a preliminary water audit. The initial step in water loss prevention is the water loss calculation. Secondly we must locate and eliminate all water leaks. Sounds easy, doesn't it?

The following steps can be utilized to prevent or reduce water loss and should be incorporated into a water loss prevention plan:

1. Read the master meters daily and at the same time each day. At a minimum, they should be read Monday through Friday. This will minimize water loss due to a large leak that can go undetected for a week or month.

2. Read all meters in the distribution system within a 3- to 5-day window. When the meters are read over a 2-week period, this will cause fluctuations of monthly water loss numbers. However, these numbers will average out over a year's period of time.

3. Divide the distribution system into zones or subsections where possible and calculate water loss for each zone. This will allow for the prioritizing of work based upon the severity of the problem in a particular zone.

4. Utilize computer billing software to generate water loss reports for sections or zones as well as to generate an overall water loss report.

5. Install bypass monitor meters as needed to isolate lines with potential leaks. A 5/8- x 3/4-inch meter will suffice for each 100-customer section of line.

6. Install a 2-inch bypass monitor meter at water storage tanks to isolate sections of the line with potential leaks during the night (1:00 a.m. to 4:00 a.m.)

7. Utilize pressure recordings to detect fluctuating pressures and abnormally low or high pressures in distribution system lines.

8. Test and change-out all meters according to Kentucky Public Service Commission (PSC) regulations. PSC regulations require residential meters to be tested and changed-out in 10-year intervals. Four-inch and larger meters are to be tested annually.

9. It may be feasible to hire a part-time operator to utilize leak detection equipment to search for leaks. A portion of the distribution system could be covered each month.

10. Identify sections of pipe in the distribution system with the most frequent line breaks. Budgeting for infrastructure replacement is imperative in any water utility.

11. Having a main transmission line from the master meter to a water storage tank will reduce pressure fluctuations in the distribution system and result in fewer line breaks.

12. Provide the necessary resources for manpower and equipment to properly maintain the distribution system appurtenances such as gate valves, pressure reducing valves, and hydrants.

Today's advanced technology can certainly enhance our water loss prevention plan. Computers not only utilize software for spreadsheets to calculate water loss expediently, but can be used in a variety of ways to identify areas of the distribution system with potential leaks. Both master meters and customer meters can be read by satellites or other automated meter reading mechanisms. Telemetry/SCADA systems operated with computers can produce trend charts for water flows, water pressures, and water levels in storage tanks. This kind of data is valuable in determining where leaks are or are not prevalent. Computers analyze hydraulic data to determine if theoretical and actual water flows and water pressures in the distribution system match. Computerized maps with GPS and GIS data are beneficial when used properly. A water utility's budget is the major limiting factor as to why technology is not used more frequently.

By industry standards, more than 15 percent water loss in a rural system in unacceptable. Probably, no one realizes this more than the managers of water districts, water associations, and investor-owned utilities under the jurisdiction of the Kentucky Public Service Commission. Just as we should be concerned with our health due to being overweight, the PSC is concerned with the financial health and well-being of water utilities under their jurisdiction in Kentucky. PSC inspectors routinely discuss water loss during their inspections. When a water system exceeds 15 percent water loss on their annual report to the PSC, a deficiency is issued. Numerous water systems' response to the PSC's Deficiency Tracking Reports (DTR) has been deemed unacceptable by PSC. A common request from PSC to the water system with a deficiency due to water loss is for a water loss control plan. A good water loss control plan should include the above-mentioned components with a time frame to implement the improvements and follow-up evaluations to measure the success of the plan.

Whether we are weighing in or wading in, we should always do so with a goal in mind. We cannot continue to ignore our problem and hope it resolves itself. Just as there are various diets to control an individual's weight, there are various methods for controlling water loss.

Let's start implementing all of our good intentions!

By Barry Back, Circuit Rider
KY Rural Water Association

RATES

ALTERNATIVE RATE FILING

•807 KAR 5:076

•PURPOSE: SIMPLIFIED AND LESS EXPENSIVE PROCEDURE

•UTILITIES NEED ONLY FILE SIMPLIFIED APPLICATION FORM WITH PSC

•ELIGIBILITY:
•UTILITIES WITH GROSS ANNUAL REVENUES ≤ $5,000,000

RATES

ALTERNATIVE RATE FILING

FORMS ON PSC.KY.GOV

807 KAR 5:076

Alternative Rate Filing

- Section 3: Record upon which decision made
- Section 4: Application
- Section 5: Notice to customers
- Section 6: Notice to Commission
- Section 7: Effective Date of Proposed Rates

- Section 13: Role of non-attorneys
- Authorized water district personnel may:
  - file application
  - responses to requests for information
  - appear at conferences

- BUT Attorney must represent at hearing (if held)

SUBMIT ORIGINAL AND FIVE ADDITIONAL COPIES, UNLESS FILING ELECTRONICALLY

APPLICATION FOR RATE ADJUSTMENT
BEFORE THE PUBLIC SERVICE COMMISSION

For Small Utilities Pursuant to 807 KAR 5:076
(Alternative Rate Filing)

____
(Name of Utility)

____
(Business Mailing Address - Number and Street, or P.O. Box)

____
(Business Mailing Address - City, State, and Zip)

____
(Telephone Number)

BASIC INFORMATION

NAME, TITLE, ADDRESS, TELEPHONE NUMBER and E-MAIL ADDRESS of the person to whom correspondence or communications concerning this application should be directed:

____
(Name)

____
(Address - Number and Street or P.O. Box)

____
(Address - City, State, Zip)

____
(Telephone Number)

____
(Email Address)

(For each statement below, the Applicant should check either "YES", "NO", or "NOT APPLICABLE" (N/A))

YES NO N/A

1. a. In its immediate past calendar year of operation, Applicant had $5,000,000 or less in gross annual revenue.

   b. Applicant operates two or more divisions that provide different types of utility service. In its immediate past calendar year of operation, Applicant had $5,000,000 or less in gross annual revenue from the division for which a rate adjustment is sought.

2. a. Applicant has filed an annual report with the Public Service Commission for the past year.

   b. Applicant has filed an annual report with the Public Service Commission for the two previous years.

3. Applicant's records are kept separate from other commonly-owned enterprises.

YES NO N/A

4. a. Applicant is a corporation that is organized under the laws of the state of ____________, is authorized to operate in, and is in good standing in the state of Kentucky.

   b. Applicant is a limited liability company that is organized under the laws of the state of ____________, is authorized to operate in, and is in good standing in the state of Kentucky.

   c. Applicant is a limited partnership that is organized under the laws of the state of ____________, is authorized to operate in, and is in good standing in the state of Kentucky.

   d. Applicant is a sole proprietorship or partnership.

   e. Applicant is a water district organized pursuant to KRS Chapter 74.

   f. Applicant is a water association organized pursuant to KRS Chapter 273.

5. a. A paper copy of this application has been mailed to Office of Rate Intervention, Office of Attorney General, 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601-8204.

   b. An electronic copy of this application has been electronically mailed to Office of Rate Intervention, Office of Attorney General at rateintervention@ag.ky.gov.

6. a. Applicant has 20 or fewer customers and has mailed written notice of the proposed rate adjustment to each of its customers no later than the date this application was filed with the Public Service Commission. A copy of this notice is attached to this application. **(Attach a copy of customer notice.)**

   b. Applicant has more than 20 customers and has included written notice of the proposed rate adjustment with customer bills that were mailed by the date on which the application was filed. A copy of this notice is attached to this application. **(Attach a copy of customer notice.)**

   c. Applicant has more than 20 customers and has made arrangements to publish notice once a week for three (3) consecutive weeks in a prominent manner in a newspaper of general circulation in its service area, the first publication having been made by the date on which this Application was filed. A copy of this notice is attached to this application. **(Attach a copy of customer notice.)**

7. Applicant requires a rate adjustment for the reasons set forth in the attachment entitled "Reasons for Application." **(Attach completed "Reasons for Application" Attachment.)**

YES NO N/A

8. Applicant proposes to charge the rates that are set forth in the attachment entitled "Current and Proposed Rates." **(Attach completed "Current and Proposed Rates" Attachment.)**

9. Applicant proposes to use its annual report for the immediate past year as the test period to determine the reasonableness of its proposed rates. This annual report is for the 12 months ending December 31,________.

10. Applicant has reason to believe that some of the revenue and expense items set forth in its most recent annual report have or will change and proposes to adjust the test period amount of these items to reflect these changes. A statement of the test period amount, expected changes, and reasons for each expected change is set forth in the attachment "Statement of Adjusted Operations." **(Attach a completed copy of appropriate "Statement of Adjusted Operations" Attachment and any invoices, letters, contracts, receipts or other documents that support the expected change in costs.)**

11. Based upon test period operations, and considering any known and measurable adjustments, Applicant requires additional revenues of $ ____________ and total revenues from service rates of $ __________ . The manner in which these amounts were calculated is set forth in "Revenue Requirement Calculation" Attachment. **(Attach a completed "Revenue Requirement Calculation" Attachment.)**

12. As of the **date of the filing of this application**, Applicant had ________customers.

13. A billing analysis of Applicant's current and proposed rates is attached to this application. **(Attach a completed "Billing Analysis" Attachment.)**

14. Applicant's depreciation schedule of utility plant in service is attached. **(Attach a schedule that shows per account group: the asset's original cost, accumulated depreciation balance as of the end of the test period, the useful lives assigned to each asset and resulting depreciation expense.)**

15. a. Applicant has outstanding evidences of indebtedness, such as mortgage agreements, promissory notes, or bonds.

    b. Applicant has attached to this application a copy of each outstanding evidence of indebtedness (e.g., mortgage agreement, promissory note, bond resolution).

    c. Applicant has attached an amortization schedule for each outstanding evidence of indebtedness.

YES NO N/A

16. a. Applicant is not required to file state and federal tax returns.

    b. Applicant is required to file state and federal tax returns.

    c. Applicant's most recent state and federal tax returns are attached to this Application. **(Attach a copy of returns.)**

17. Approximately __________ **(Insert dollar amount or percentage of total utility plant)** of Applicant's total utility plant was recovered through the sale of real estate lots or other contributions.

18. Applicant has attached a completed Statement of Disclosure of Related Party Transactions for each person who 807 KAR 5:076, §4(h) requires to complete such form.

By submitting this application, the Applicant consents to the procedures set forth in 807 KAR 5:076 and waives any right to place its proposed rates into effect earlier than six months from the date on which the application is accepted by the Public Service Commission for filing.

I am authorized by the Applicant to sign and file this application on the Applicant's behalf, have read and completed this application, and to the best of my knowledge all the information contained in this application and its attachments is true and correct.

Signed ______________________________
Officer of the Company/Authorized Representative

Title ______________________________

Date ______________________________

COMMONWEALTH OF KENTUCKY

COUNTY OF ________________

Before me appeared , who after being duly sworn, stated that he/she had read and completed this application, that he/she is authorized to sign and file this application on behalf of the Applicant, and that to the best of his/her knowledge all the information contained in this application and its attachments is true and correct.

____
Notary Public

My commission expires: ______________________________

LIST OF ATTACHMENTS
(Indicate all documents submitted by checking box)

- ☐ Customer Notice of Proposed Rate Adjustment
- ☐ "Reasons for Application" Attachment"
- ☐ Current and Proposed Rates" Attachment
- ☐ "Statement of Adjusted Operations" Attachment
- ☐ "Revenue Requirements Calculation" Attachment
- ☐ Attachment Billing Analysis" Attachment
- ☐ Depreciation Schedules
- ☐ Outstanding Debt Instruments (i.e., Bond Resolutions, Mortgages, Promissory Notes, Amortization Schedules.)
- ☐ State Tax Return
- ☐ Federal Tax Return
- ☐ Statement of Disclosure of Related Party Transactions - ARF Form 3

FILING CHECKLIST

Alternative Rate Filing: CHECKLIST TRACKS REG

ALTERNATIVE RATE ADJUSTMENT (ARF)

Filing Requirements Checklist

(Applicable Regulation: 807 KAR 5:076)

Case No. ____________ Applicant Name ________________ Received Date ____________ Form Circulation Date ____________

Instructions:

1) Each division noted by checkmark ( ) is to complete its review and pass on within two days of receipt.
2) This form is to list only the specific filing deficiencies as identified in the regulations. If additional information is needed, an information request must be issued.
3) Staff member should use initials and list date review is completed.
4) Return to Docket Section following review by all divisions.

Reviewed by following Divisions: Date Staff Member

	Division	Date	Staff Member
________	Filings	________	________
________	Financial Analysis	________	________
________	Legal	________	________

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met: Yes	Requirement Met: No	Waiver Requested	Approve Waiver?: Yes	Approve Waiver?: No
	807 KAR 5:076:						
Filings	Section 4(2)(a)	Original and 5 copies of the application.					
	807 KAR 5:076:						
Legal	Section 4(1)(a)	Completed ARF Form-1 signed by applicant or officer & under oath					
Financial Analysis	Section 4(1)(b)	Copy of all outstanding evidences of indebtedness, such as mortgage agreements, promissory notes, and bond resolutions					
Financial Analysis	Section 4(1)(c)	Copy of amortization schedule for each outstanding bond issuance, promissory note, and debt instrument					

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met: Yes	Requirement Met: No	Waiver Requested	Approve Waiver?: Yes	Approve Waiver?: No
Financial Analysis	Section 4(1)(d)	Depreciation Schedule for all utility plant in service					
Legal	Section 4(1)(e)	Most recent state and federal tax returns (not applicable to water districts)					
Financial Analysis	Section 4(1)(f)	Detailed Analysis of Applicant's customers' bills showing revenues from present and proposed rates from each customer class (Attachment BA-DB or Attachment BA-FR is attached to ARF Form-1)					
Legal	Section 4(1)(g)	Notice of the proposed rate change to customers					
Legal	Section 5(4)	Does notice of proposed rate adjustment meet regulatory requirements?*					
Legal	Section 4(1)(h)	Completed ARF Form-3 for each member of board of directors/commissioners, CEO or general manager, ownership of 10% or more.					
Legal	Section 4(1)(i)	~~If applicant is a water district increasing current rates or implementing new rates, a statement from an authorized official indicating the date the proposed increase or new rate was reported to the governing body of the county in which the largest number of its customers reside and the date it presented testimony or is scheduled to present testimony to that governing body.~~ *****No longer required*****	n/a				
Legal	Section 4(2)(b)	A copy of application has been delivered, mailed or e-mailed to Office of Rate Intervention, Office of Attorney General					
Legal	Section 4(1)(a)	A completed Attachment SR (Reasons for Application) is attached to ARF Form-1					
Legal	Section 4(1)(a)	A completed Attachment CPR (Current and Proposed Rates) is attached					
Financial Analysis	Section 4(1)(a)	A completed Attachment SAO (Statement of Adjusted Operations) is attached.					

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met: Yes	Requirement Met: No	Waiver Requested	Approve Waiver?: Yes	Approve Waiver?: No
Financial Analysis	Section 4(1)(a)	A completed Revenue Requirement Calculation Form (Attachment RR-DC or Attachment RR-OR) is attached to ARF Form-1					

All filings with the Kentucky Public Service Commission which contain personal information must be redacted by the filer pursuant to 807 KAR 5:001 Sec. 4 (10).
Filings which are not in compliance will be rejected.

*Section 5 Notice

If a utility has twenty (20) or fewer customers or is a sewage utility, the utility shall mail a written notice to each customer no later than the date on which the application is submitted to the commission.

If a utility has more than twenty (20) customers and is not a sewage utility, it shall provide notice by:

1. Including notice with customer bills mailed no later than the date the application is submitted to the commission;

2. Mailing a written notice to each customer no later than the date the application is submitted to the commission;

3. Publishing notice once a week for three (3) consecutive weeks in a prominent manner in a newspaper of general circulation in the utility's service area, the first publication to be made no later than the date the application is submitted to the commission; or

4. Publishing notice in a trade publication or newsletter delivered to all customers no later than the date the application is submitted to the commission.

A utility that provides service in more than one county and is not a sewage utility may use a combination of the notice methods.

Each notice shall contain:

1. Dates proposed rates are expected to be filed with the Commission.
2. The present rates and proposed rates for each customer classification to which the proposed rates will apply;
3. The amount of the change requested in both dollar amounts and percentage change for each customer classification to which the proposed rates apply.
4. The amount of the average usage and the effect upon the average bill for each customer classification to which the proposed rates will apply.
5. That a person may examine this application at the main offices of (name of utility) located at (the utility's address).
6. That a person may examine this application at the Commission's office at 211 Sower Boulevard, Frankfort, KY Monday – Friday, 8 a.m. – 4:30 p.m. or through the Commission's website at *http://psc.ky.gov*.
7. Comments regarding the application may be submitted to the Commission through the Commission's Website or via mail at Public Service Commission, P.O. Box 615, Frankfort, KY 40602.
8. That the rates contained in this notice are the rates proposed by (name of utility) but that the Public Service Commission may order rates to be charged that differ from the proposed rates contained in this notice;
9. That a person may submit a timely written request to intervene to the Public Service Commission, P.O. Box 615, Frankfort, Kentucky 40602, establishing the grounds for the request and including the statutes and interest of the party.
10. If the Commission does not receive a written request for intervention within 30 days of initial publication or mailing of notice, the Commission may take final action on the application.

RATES

PURCHASED WATER ADJUSTMENT

KRS 278.015

- *ADJUST RATES TO REFLECT WHOLESALE SUPPLIER INCREASE WITHOUT PSC PRIOR APPROVAL*

807 KAR 5:068

- FILE APPLICATION WITHIN 20 DAYS OF ADJUSTMENT
- NOTICE TO CUSTOMERS
- FILE REVISED TARIFF SHEET WITHIN 20 DAYS OF COMMISSION ORDER APPROVING PROPOSED RATES

FILING CHECKLIST

Purchased Water Adjustment: CHECKLIST TRACKS REG

PURCHASED WATER ADJUSTMENT - WATER DISTRICTS & ASSOCIATIONS

Filing Requirements Checklist

(Applicable Authority: KRS 278.012; KRS 278.015; 807 KAR 5:068)

Case No. ____________ Applicant Name ____________________ Received Date ______________ Form Circulation Date ____________

Instructions:

1) Each division noted by checkmark ( ) is to complete its review and pass on within two days of receipt.
2) This form is to list only the specific filing deficiencies as identified in the regulations. If additional information is needed, an information request must be issued.
3) Staff member should use initials and list date review is completed.
4) Return to Docket Section following review by all divisions.

Reviewed by following Divisions:		Date	Staff Member
____________	Filings	____________	____________
____________	Financial Analysis	____________	____________
____________	Legal	____________	____________

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met		Waiver Requested	Approve Waiver?	
			Yes	No		Yes	No
	807 KAR 5:001						
Filings	Section 7(1)	The original and 10 copies of completed application form.					
	807 KAR 5:068						
Financial Analysis	Section 1	(b) A schedule listing current and proposed rates					
Financial Analysis		(c) A copy of the supplier's notice showing a change in supplier's base rate					
Financial Analysis		(d) The calculation and all supporting documents used to determine the change in purchased water costs sufficient to determine the accuracy of the calculation					

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met		Waiver Requested	Approve Waiver?	
			Yes	No		Yes	No
Legal		(e) A copy of the resolution or other document of the utility's governing body authorizing the proposed rates					
Legal		~~(f) If the applicant is a water district and proposes to increase any of its rates for service, a statement from an authorized official of the district indicating the date its proposed rate adjustment was reported to the governing body of the county in which the largest number of its customers reside and the date it presented testimony, or is scheduled to present testimony, to that governing body.~~ *****No longer required*****	n/a				
Financial Analysis	Section 4	Satisfactorily completed Purchased Water Adjustment Form 1					

NOT AN INITIAL FILING REQUIREMENT

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met Yes	Requirement Met No	Waiver Requested	Approve Waiver? Yes	Approve Waiver? No
Legal	Section 5	If a copy of the public notice is included, does it meet the requirements?					

All filings with the Kentucky Public Service Commission which contain personal information must be redacted by the filer pursuant to 807 KAR 5:001 Sec. 4 (10).
Filings which are not in compliance will be rejected.

Section 5
Notice

If a utility has twenty (20) or fewer customers, it shall mail a written notice to each customer no later than the issuance of the first bill at the increased rate.

If a utility has more than twenty (20) customers, it shall provide notice by:

1. Including notice with customer bills mailed no later than the issuance of the first bill at the increased rate;
2. Mailing a written notice to each customer no later than the issuance of the first bill at the increased rate;
3. Publishing notice one (1) time in a prominent manner in a newspaper of general circulation in the utility's service area no later than the issuance of the first bill at the increased rate; or
4. Publishing notice in a trade publication or newsletter delivered to all customers no later than the issuance of the first bill at the increased rate.

A utility that provides service in more than one (1) county may use a combination of the notice methods listed in paragraph (b) of this subsection.

A utility shall file with the commission no later than thirty (30) days from the date of the commission's order approving an adjustment to the utility's rates pursuant to this administrative regulation:

(a) If notice is mailed to its customers, an affidavit from an authorized representative of the utility verifying the contents of the notice, that notice was mailed to all customers, and the date of the mailing;

(b) If notice is published in a newspaper of general circulation in the utility's service area, an affidavit from the publisher verifying the contents of the notice, that the notice was published, and the date of the notice's publication; or

(c) If notice is published in a trade publication or newsletter delivered to all customers, an affidavit from an authorized representative of the utility verifying the contents of the notice, the mailing of the trade publication or newsletter, that notice was included in the publication or newsletter, and the date of mailing.

Each notice shall contain:

1. The effective date;
2. The present rates and proposed rates for each customer classification to which the proposed rates will apply;
3. The amount of the change requested in both dollar amounts and percentage change for each customer classification to which the proposed rates will apply;
4. The amount of the average usage and the effect upon the average bill for each customer classification to which the proposed rates will apply;
5. A statement that a person may examine this application at the offices of (utility name) located at (utility address); and
6. A statement that a person may examine this application at the commission's offices located at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8:00 a.m. to 4:30 p.m., or through the commission's Web site at http://psc.ky.gov.

RATES

NONRECURRING CHARGES

807 KAR 5:011 SECTION 10

- *DOCUMENTATION*
- *COST JUSTIFICATION*
- *PUBLIC NOTICE*
- *STATEMENT WHY REVISIONS WERE NOT INCLUDED IN MOST RECENT RATE CASE AND SHOULD NOT BE DEFERRED UNTIL NEXT GENERAL RATE CASE*
- *ONLY ENOUGH REVENUE TO PAY EXPENSES INCURRED*

FILING CHECKLIST

Nonrecurring Expense: CHECKLIST TRACKS REG

NON-RECURRING CHARGES

Filing Requirements Checklist

(Applicable Regulation: 807 KAR 5:011, Section 10)

Case No. ____________ Applicant Name ______________________ Received Date ________________ Form Circulation Date ______________

Instructions:

1) Each division noted by checkmark is to complete its review and pass on within two days of receipt.
2) This form is to list only the specific filing deficiencies as identified in the regulations. If additional information is needed, an information request must be issued.
3) Staff member should use initials and list date review is completed.
4) Return to Docket Section following review by all divisions.

Reviewed by following Divisions:

Date		Staff Member
________________	Filings	________________________________
________________	Financial Analysis	________________________________
________________	Legal	________________________________

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met		Waiver Requested	Approve Waiver?	
			Yes	No		Yes	No
	807 KAR 5:011:						
Legal	Section 10(1)(b)	Is copy of public notice included?					
Legal	Section 8	If copy of public notice is included, did it meet requirements?* (For sewers, direct mailing is required. See KRS 278.185)					
Legal	278.180	Has 30 days' notice been given to the Commission? If no					

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met		Waiver Requested	Approve Waiver?	
			Yes	No		Yes	No
		effective date stated, advance notice not required.					
	807 KAR 5:011						
Legal	Section 10(1)(b)	Verification that notice made in accordance with Section 8.					
Legal	Section 10(4)	Statement by utility confirming that copy of filing was simultaneously sent to the Attorney General.					
Legal	Section 10(1)(f)	~~If applicant is a water district, a statement from an authorized official of the district indicating the date the proposed rate adjustment was reported to the appropriate governing body and the date it presented testimony or is scheduled to present testimony to that governing body.~~ ***** No Longer Required *****	n/a				
Financial Analysis	Section 10(1)	(a) Cost justification for each rate change proposed including all supporting documentation necessary to determine the reasonableness of the charge.					
Financial Analysis		(c) Statement explaining why proposed changes could not have been included in last rate case and why current conditions prevent deferring change until next rate case.					
Financial Analysis		(d) Impact statement identifying group of customers (both existing and potential) affected by proposed change.					
Financial Analysis		(e) Income statement and balance sheet for a recent 12-month period or an affidavit from a utility authorized representative attesting that the utility's income and balance sheet are on file with the Commission.					
Financial	Section 10(3)	(a) – (c) If the additional revenue to be generated from the					

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met		Waiver Requested	Approve Waiver?	
			Yes	No		Yes	No
Analysis		proposed tariff revisions exceeds by five (5) percent the total revenues provided by all non-recurring charges for a recent twelve (12) month period, the utility must file, in addition to the information set out in subsection (1) of this section, the following: An absorption test showing that the additional net income generated by the tariff filing will not result in an increase in the rate of return (or other applicable valuation methods) to a level greater than that allowed in the most recent rate case. Any general rate increases received during the twelve (12) month period must be annualized.					

All filings with the Kentucky Public Service Commission which contain personal information must be redacted by the filer pursuant to 807 KAR 5:001 Sec. 4 (10). Filings which are not in compliance will be rejected.

Section 8 Notice If a utility has twenty or fewer customers or is a sewage utility, it shall mail a written notice to each customer no later than the date the tariff filing is submitted to the commission.

If a utility has more than twenty customers and is not a sewage utility, it shall provide notice by:

1. Including notice with customer bills mailed no later than the date the tariff filing is submitted to the commission;

2. Mailing a written notice to each customer no later than the date the tariff filing is submitted to the commission;

3. Publishing notice once a week for three (3) consecutive weeks in a prominent manner in a newspaper of general circulation in the utility's service area, the first publication to be made no later than the date the tariff filing is submitted to the commission; or

4. Publishing notice in a trade publication or newsletter delivered to all customers no later than the date the tariff filing is submitted to the commission.

A utility that provides service in more than one county and is not a sewage utility may use a combination of the above notice methods.

Each notice shall contain:

1. The proposed effective date and the date the proposed rates are expected to be filed with the commission;

2. The present rates and proposed rates for each customer classification to which the proposed rates will apply;

3. The amount of the change requested in both dollar amounts and percentage change for each customer classification to which the proposed rates will apply;

4. The amount of the average usage and the effect upon the average bill for each customer classification to which the proposed rates will apply;

5. A statement that a person may examine this tariff filing at the offices of (utility name) located at (utility address);

6. A statement that a person may examine this tariff filing at the commission's offices located at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8:00 a.m. to 4:30 p.m., or through the commission's website at *http://psc.ky.gov*;

7. A statement that comments regarding this tariff filing may be submitted to the Public Service Commission through its website or by mail to Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602;

8. A statement that the rates contained in this notice are the rates proposed by (utility name) but that the Public Service Commission may order rates to be charged that differ from the proposed rates contained in this notice;

9. A statement that a person may submit a timely written request for intervention to the Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602, establishing the grounds for the request including the status and interest of the party; and

10. A statement that if the commission does not receive a written request for intervention within thirty days of the initial publication or mailing of the notice, the commission may take final action on the tariff filing.

HONAKER LAW OFFICE, PLLC

ROWAN WATER DIRECTOR TRAINING II

PRESENTATION BY BRITTANY HAYES KOENIG

REGULATORY COMPLIANCE II

TARIFF & CPCN

RATES: TARIFFS

- *KRS 278.160: UTILITY MUST FILE AND ADHERE TO TARIFF*
- *KRS 278.170: NO RATE OR SERVICE DISCRIMINATION*
- *KRS 278.180: RATE CHANGES*

- 807 KAR 5:001: rules of procedures for proceedings
- 807 KAR 5:006: general procedures for providing service
- 807 KAR 5:011: tariff regulations

RATES: TARIFFS

- ***KRS 278.160(1)***: *RATES MUST BE FILED WITH PSC*
UTILITY MUST FILE TARIFF WITH PSC SHOWING SCHEDULE OF RATES FOR EACH CLASS OF CUSTOMERS TERMS AND CONDITIONS UNDER WHICH SERVICE IS PROVIDED TO CUSTOMERS

- ***KRS 278.160(2): FILED RATE DOCTRINE:***
UTILITY CANNOT CHARGE OR COLLECT GREATER OR LESS COMPENSATION FOR SERVICE RENDERED THAN ITS FILED TARIFF
CUSTOMER CANNOT RECEIVE SERVICE THAT DIFFERS FROM THE TARIFF

KRS 278.170

- NO UNREASONABLE PREFERENCE BETWEEN CUSTOMERS
  - CASE DISCUSSION

TARIFF SAMPLE LIBRARY TARIFF FILING TARIFF MONITORING

Starting a new filing

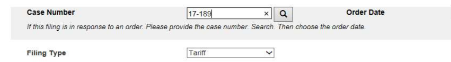
As enter the Tariff Filing system – you should note your userID top left. Seeing that lets you know you are logged in and recognized with rights and privileges of a Tariff Filer.

Under the menu "Services", choose "New Tariff Upload" to begin a new filing.

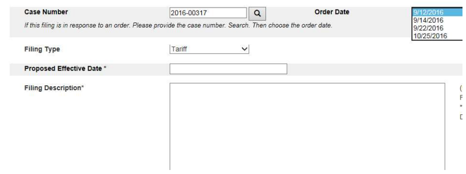
NOTE the new option – to "Resume" in case you are cut off before finishing a filing. No longer do you have to start over.

If you represent more than one utility – your first step will be to select the utility this tariff filing will be for. Most of the contact information should be pre-filled for you either from your last filing or from your user account. Correct as needed.

If this filing is the result of a order within a KY PSC Case provide the case number. You may provide a "short hand" case number. For example for case 2017-00189 you may simply type 17-189. Once the case number is entered click the magnifying glass to search for the order dates of that case.



Select the correct date of the order once the list returns.

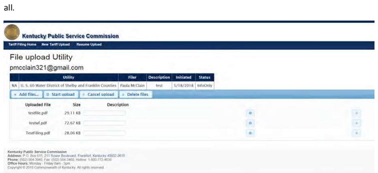


Finish the filing record with a proposed effective date and description. Then click "Continue".

Then you will begin to upload the documents needed.

Uploading the documents

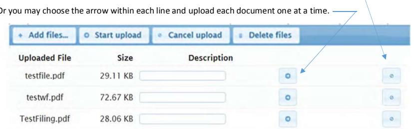
Click the large "Add files" button to select files from your computer. Repeat until you have found them all.



At this point none of the files have been uploaded yet. Choose the "not" button at the end of any row to eliminate an un-intended document.

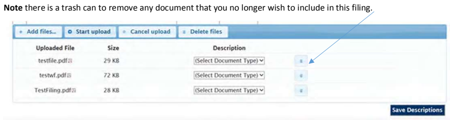
You may use the large "Start upload" button to upload all files.

Or you may choose the arrow within each line and upload each document one at a time.



Use the provided list to describe each file. Then choose "Save Descriptions"

Note there is a trash can to remove any document that you no longer wish to include in this filing.

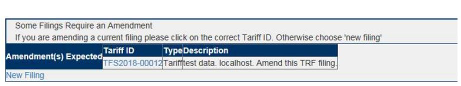


You can add more documents and edit the descriptions as needed. When you are satisfied with the collection of documents and their descriptions click "Complete".

The screen should transition to a printable receipt and you should receive an email receipt at the address provided in the filing record.

Amendment Expected

As you choose to make a new filing if any previous filing requires an amendment you will be notified. You can choose either to work on the necessary amendment or to continue with your new filing as planned.

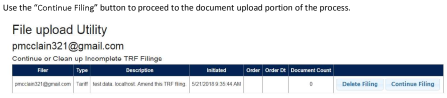


Resuming a filing in progress

If elect to continue a filing, you will be presented with a list of filings in progress.

Use the "Delete Filing" button to remove any old filings that you will not complete.

Use the "Continue Filing" button to proceed to the document upload portion of the process.



Deleting an entire filing

Another means to delete a filing, its record and all documents is the large "Delete Files" button on the upload screen.

807 KAR 5:006: GENERAL RULES FOR PROVIDING SERVICE

- SECTION 5: SUBSTANTIAL SERVICE CHANGES
- SECTION 6: SPECIAL REQUIREMENTS REQUIRE PSC APPROVAL
- SECTION 7: METER READINGS AND BILLING
- SECTION 8: DEPOSITS
- SECTION 9: NONRECURRING CHARGES
- SECTION 11: BILL ADJUSTMENT
- SECTION 15: REFUSAL OR TERMINATION OF SERVICE

RATES: TARIFFS

If it isn't in your tariff, you cannot do it

If it is in your tariff, you must do it

KRS 278.180: CHANGE IN RATES

- *30 days notice to Commission*
- *File revised tariff sheets*
- *State proposed changes*
- *State time changed rates go into effect*

807 KAR 5:011: FILING REQUIREMENTS FOR TARIFFS

- *Customer Notice*
- *Billing insert*
- *Newspaper of general circulation*
- *Newsletter distributed to all customers*
- *Public posting in utility premises and web site*

Rates: Tariffs

PROPOSED RATES BECOME EFFECTIVE ON DATE STATED IF:

- *Proper notice to public*
- *Tariff sheet complies with 807 KAR 5:011*
- *Commission does not suspend proposed rates per KRS 278.190*

807 KAR 5:001: PROCEDURAL RULES FOR PROCEEDINGS

- *Section 16: General Adjustment of Existing Rates*
- *Application not deemed filed until meets all requirements*
- *Section 17: Notice of General Rate Adjustment*

TARIFF

- PROCESS OF REVISING TARIFF
- KRS 278.030
- KRS 278.160
- TARIFF HAS STATUS OF LAW
- FILED RATES MUST BE ENFORCED.

TARIFF REVISIONS

30 DAYS PRIOR NOTICE TO PSC

NOTICE IS FILING A NEW TARIFF SHEET

SUBMIT COVER LETTER & TARIFF SHEET IN THE TARIFF FILING SYSTEM

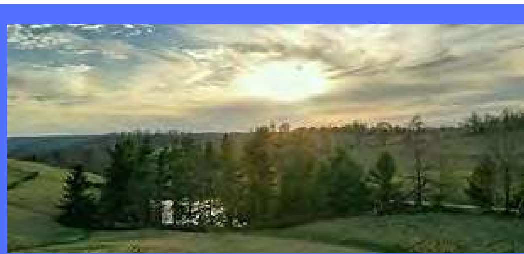
TARIFF SHEET MUST COMPLY WITH REGS

TARIFF SHEET SHOULD STATE EFFECTIVE DATE

ATTORNEY IS NOT REQUIRED

PUBLIC NOTICE MUST BE PROVIDED

SERVICE



807 KAR 5:006: GENERAL RULES FOR PROVIDING SERVICE

- SECTION 10: CUSTOMER COMPLAINTS
- SECTION 11: BILL ADJUSTMENT AND MONITORING USAGE
- SECTION 14: CUSTOMER RELATIONS
- SECTIONS 17 – 19: METER TESTING
- SECTION 26: INSPECTION OF SYSTEMS
- SECTION 27: REPORTING ACCIDENTS

WITHIN 2 HOURS CALL OR EMAIL THE PSC
CALL 502-782-7904 OR EMAIL PSC.WATER.NOTICE@KY.GOV

NOTES AND INSTRUCTIONS

A) **ANSWER ALL THE QUESTIONS ON PAGES 1, 2, 3, & 4.**
Answer all the questions on each page completely before proceeding to the next page.
Click on the Link at the bottom of the page to "jump" to the corresponding page.

B) **PROCEED TO PAGE 5 FOR YOUR QUARTERLY METER REPORT.**
Check to make sure the Quarterly Meter Report is completely filled out. If data is missing, go back through pages 1, 2, 3, & 4 and make sure all questions have been answered.

C) **SAVE THE SPREADSHEET AND E-MAIL IT TO THE KENTUCKY PUBLIC SERVICE COMMISSION**
Click on the Link below to proceed to e-mail, attach this completed spreadsheet and hit send

Division of Inspections: PSC.Water.Notice@ky.gov

D) **PRINT OUT THE QUARTERLY METER REPORT FOR YOUR RECORDS**

E) **TABLE OF CONTENTS**
Click on the Link below to proceed to that page

E) **REGULATION 807 KAR 5:066 Section 16. Periodic Tests.**
(1) Each utility shall test periodically all water meters so that no meter will remain in service without test for a period longer than specified in the following table:

SIZE OF METER (inches)	INTERVAL BETWEEN TEST YEARS
5/8	10
5/8 x 3/4	10
3/4	10
1	10
1 1/4	4
1 1/2	4
2	4
3	2
4 and larger	1

SERVICE

807 KAR 5:066: general rules for water utilities

- *Section 2: Information provided to customers*
- *Section 3: Water quality*
- *Section 4: Continuity of service*
- *Section 5: Water pressure*
- *Section 7: Construction standards*
- *Section 11: Extension of service*
- *Section 12: Service Connections*
- *Section 15: Meter accuracy requirements*

Ky's Underground Facilities Protection Law

The Act:

- Underground Facility Damage Prevention Act of 1994
- Effective January 1, 1995
- KRS 367.4901 through 367.4917
- Amended in 2018 to give PSC enforcement authority
- Most recently amended in 2021
- Establishes one-call (811) center
- Sets requirements for excavators and operators
- Establishes enforcement mechanisms

Ky's Underground Facilities Protection Law

Water Utilities

- Duty under two provisions of the Act
  - KRS 367.4911 provides the duties of Excavators.
    - A water utility is an excavator when it installs or repairs its own underground facilities, and when it engages in digging or probing to investigate the source of a water leak. When a water utility engages in excavation, all of the provisions of KRS 367.4911 apply to water utilities.
  - KRS 367.4909 provides the duties of Operators.
    - A water utility is an operator as defined by the Act because a water district operates underground facilities to serve the public. A water utility transports its product to the public by use of underground facilities. All of the provisions of KRS 367.4909 apply to water districts, except those designated as applicable only to operators of gas or hazardous liquid facilities, such as the requirement to report damage to the Commission.

Ky's Underground Facilities Protection Law

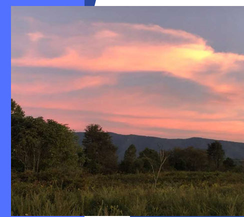
Commission Jurisdiction

- Under KRS 367.4917(6) the Kentucky Public Service Commission has statewide authority to enforce the ACT and seek civil penalties for any violation of the ACT that results in damage to an underground facility used to transport gas or hazardous liquid.
- The Commission's Division of Inspections (DOI) investigates all incidents of damage to underground natural gas facilities.
  - Operators of natural gas facilities are required by KRS 367.4909(4) to report incidents of damage to their facilities to the Commission within 30 days of the damage.
  - DOI investigates to determine if any provision of the Act was violated, not necessarily to determine "fault" for the damage.

CONSTRUCTION

KRS 278.020 - CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

- Utility cannot construct any plant, equipment, property or facility until obtain obtained certificate from the Public Service that public convenience and necessity requires the construction
- Exception: extensions in the ordinary course of business



CONSTRUCTION

DEFINITION OF EXTENSION IN THE ORDINARY COURSE OF BUSINESS

EXTENSION THAT DOES NOT
CREATE WASTEFUL DUPLICATION
CONFLICT WITH EXISTING SERVICE
INVOLVE SUFFICIENT CAPITAL OUTLAY TO MATERIALLY AFFECT UTILITY'S CURRENT FINANCIAL CONDITION
RESULT IN INCREASED CHARGES TO CUSTOMERS

807 KAR 5:001 SECTION 15(3)

PSC CONSIDERATIONS FOR ISSUING CPCN
- NEED FOR THE PROJECT
- REVIEWS OTHER ALTERNATIVES
- WATER SUPPLY – TREATMENT PLANT OR PURCHASE?
- LINE SIZES
- TREATMENT OPTIONS
- COST/BENEFIT ANALYSIS

PREFERENCE FOR LEAST COST

CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY - CONSTRUCTION

Filing Requirements Checklist

(Applicable Authority: KRS 278.020(1), KRS 322.340, 807 KAR 5:001, Sections 4, 7, 14 and 15(2))

Case No. ____________ Applicant Name ______________________ Received Date ________________ Form Circulation Date ______________

Instructions:
1) Each division noted by checkmark ( ) is to complete its review and pass on within two days of receipt.
2) This form is to list only the specific filing deficiencies as identified in the regulations. If additional information is needed, an information request must be issued.
3) Staff member should use initials and list date review is completed.
4) Return to Docket Section following review by all divisions.

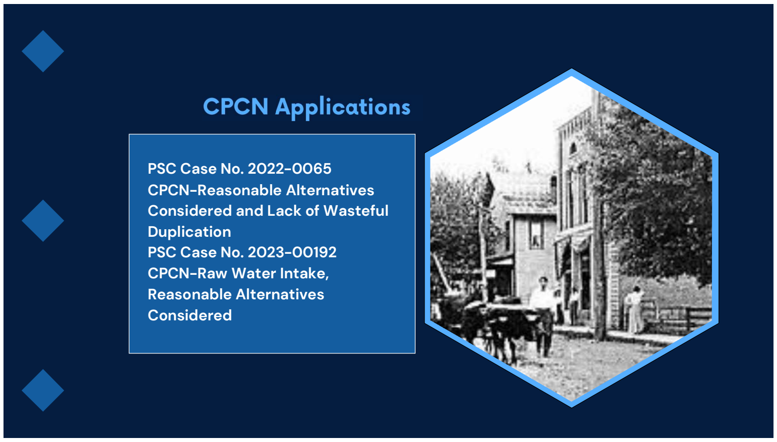
Reviewed by following Divisions:		Date	Staff Member
____________	Filings	____________	____________
____________	Financial Analysis	____________	____________
____________	Engineering	____________	____________
____________	Legal	____________	____________

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met		Waiver Requested	Approve Waiver?	
			Yes	No		Yes	No
	807 KAR 5:001:						
Filings	Section 14(1)	Full name, mailing address and e-mail address of applicant and a reference to KRS 278.020(1).					
Filings	Section 7(1)	The application and 10 copies of the application					
Legal	Section 4(3)	Paper signed by submitting party or attorney.					
Legal	Section 4(3)	Name, address, telephone number, fax number, and e-mail					

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met		Waiver Requested	Approve Waiver?	
			Yes	No		Yes	No
		address of submitting party or attorney.					
Legal	Section 4(10)	Has submitting party redacted –					
All filings with the Kentucky Public Service Commission which contain personal information must be redacted by the filer pursuant to 807 KAR 5:001 Sec. 4 (10). Filings which are not in compliance will be rejected.		- All social security numbers					
		- All birthdates					
		- All financial account numbers					
		- All other personal identification information					
Legal	Section 8(4)(b)	Has submitting party optimized pdf document –					
(Electronic Case Filing only)		- Making all text pages searchable or OCR'd					
		- Bookmarks added to distinguish sections of the paper					
Legal	Section 14(2)	If a corporation, the applicant shall identify in the application the state in which it is incorporated and the date of its incorporation, attest that it is currently in good standing in the state in which it is incorporated, and, if it is not a Kentucky corporation, state whether it is authorized to transact business in Kentucky.					
Legal	Section 14(3)	If a limited liability company, the applicant shall identify in the application the state in which it is organized and the date on which it was organized, attest that it is in good standing in the state in which it is organized, and, if it is not a Kentucky limited liability company, state whether it is authorized to transact business in Kentucky.					

Division Responsible	Law/Regulation	Filing Requirement	Requirement Met		Waiver Requested	Approve Waiver?	
			Yes	No		Yes	No
Legal	Section 14(4)	If the applicant is a limited partnership, a certified copy of its limited partnership agreement and all amendments, if any, shall be annexed to the application, or a written statement attesting that its partnership agreement and all amendments have been filed with the commission in a prior proceeding and referencing the case number of the prior proceeding.					
Engineering	Section 15(2)	(a) The facts relied upon to show that the proposed construction or extension is or will be required by public convenience or necessity.					
Engineering & Legal		(b) Copies of franchises or permits, if any, from the proper public authority for the proposed construction or extension, if not previously filed with the commission.					
Engineering		(c) A full description of the proposed location, route, or routes of the proposed construction or extension, including a description of the manner in which same will be constructed, and the names of all public utilities, corporations, or persons with whom the proposed construction or extension is likely to compete.					
Engineering		(d)(1) Three (3) copies (one (1) in portable document format on electronic storage medium and two (2) in paper medium) of maps to suitable scale showing the location or route of the proposed construction or extension, as well as the location to scale of like facilities owned by others located anywhere within the map area with adequate identification as to the ownership of the other facilities.					
Engineering		(d)(2) Plans and specifications and drawings of the proposed plant, equipment, and facilities.					

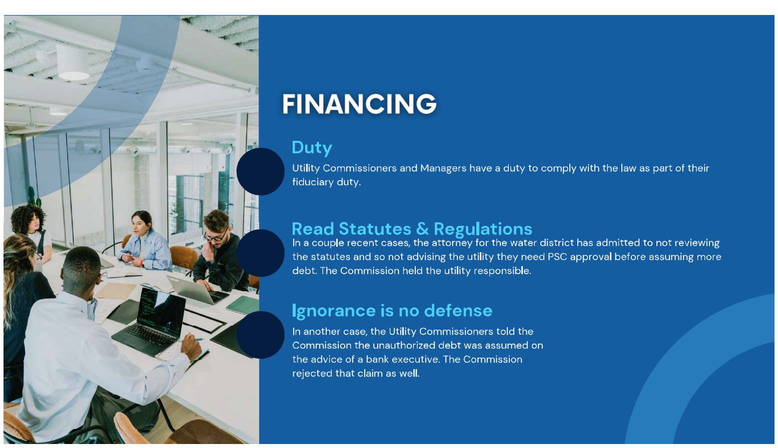
Division Responsible	Law/Regulation	Filing Requirement	Requirement Met		Waiver Requested	Approve Waiver?	
			Yes	No		Yes	No
Financial Analysis		(e) The manner in detail in which the applicant proposes to finance the proposed construction or extension.					
Financial Analysis		(f) An estimated annual cost of operation after the proposed facilities are placed into service.					
Engineering	KRS 322.340	Engineering plans, specifications, drawings, plats and reports for the proposed construction or extension prepared by a registered engineer, must be signed, sealed, and dated by an engineer registered in Kentucky.					


CPCN Applications
PSC Case No. 2022-0065
CPCN-Reasonable Alternatives Considered and Lack of Wasteful Duplication
PSC Case No. 2023-00192
CPCN-Raw Water Intake, Reasonable Alternatives Considered


FINANCING
KRS 278.300
– No utility shall issue any securities or evidences of indebtedness…until it has been authorized to do so by order of the Commission.
Exception: does not apply to notes/loans with terms of 2 years or less, renewals not to exceed 6 years
• Commission has 60 days to act once application filed.
• May be continued for good cause.
• Standard: Proper purpose/Effect on Utility's Financial Integrity
• Representative cases, discussion of recent decisions and liability.

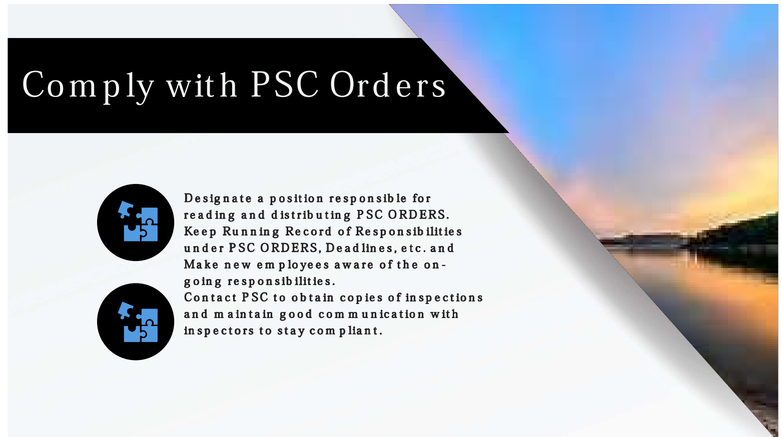

FINANCING
What is evidence of indebtedness?
Note
Bond
Installment Purchase Contract
Water Purchase Agreement (Maybe)
Assumption of Other's Obligations/Debt

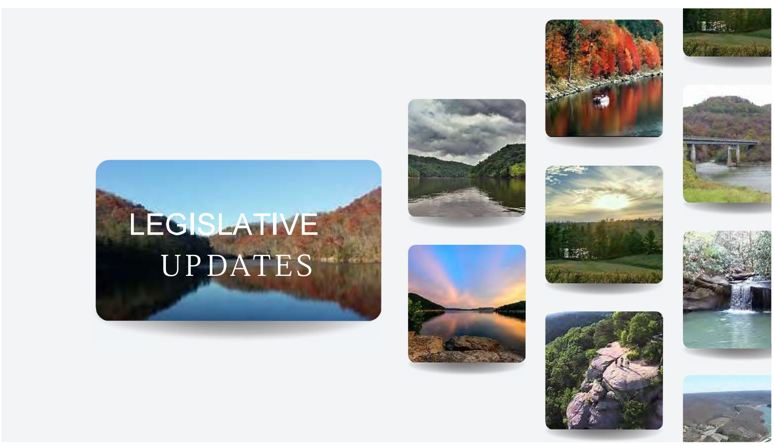

SHOW CAUSE:FINANCING OR ISSUING DEBT
•Case Studies-
•2017-00176 & 2017-00467-ARF filing with hearing and discovered debt obtained without approval that led to show cause and board resigned;
•2017-00469- debt obtained without approval found during rate case led to show cause hearing


FINANCING
Duty
Utility Commissioners and Managers have a duty to comply with the law as part of their fiduciary duty.
Read Statutes & Regulations
In a couple recent cases, the attorney for the water district has admitted to not reviewing the statutes and so not advising the utility they need PSC approval before assuming more debt. The Commission held the utility responsible.
Ignorance is no defense
In another case, the Utility Commissioners told the Commission the unauthorized debt was assumed on the advice of a bank executive. The Commission rejected that claim as well.


DISCUSSION OF
COMMISSION
ORDERS II
HONAKER LAW OFFICE, PLLC


HOT TOPICS
RECENT COMMISSION ORDERS
Financing, CPCN, Board Compensation, Rate Cases


Comply with PSC Orders
Designate a position responsible for reading and distributing PSC ORDERS. Keep Running Record of Responsibilities under PSC ORDERS, Deadlines, etc. and Make new employees aware of the on-going responsibilities.
Contact PSC to obtain copies of inspections and maintain good communication with inspectors to stay compliant.


LEGISLATIVE UPDATES


HONAKER LAW OFFICE, PLLC
ROWAN WATER
DIRECTOR TRAINING II
PRESENTATION BY BRITTANY HAYES KOENIG


REGULATORY COMPLIANCE II
GOALS


GOALS
ACTIVE BOARD, MANAGER, EMPLOYEES
CLEAR POLICIES
CALENDAR COMPLIANCE
OPEN MEETINGS RULES
TRANSPARENCY
NOTICE
BEST BUSINESS PRACTICES
OVERSIGHT OF CONSULTANTS
MAINTAIN PROFESSIONAL ASSISTANCE
CHECK MAIL, READ ORDERS, GET TRAINING
Thank you.

Rev. 12/2/2010

KENTUCKY PUBLIC SERVICE COMMISSION
REPORT OF GROSS OPERATING REVENUES DERIVED FROM INTRA-KENTUCKY
BUSINESS FOR THE YEAR ENDING DECEMBER 31, 20____

Name of Utility Reporting ______________________________

FEIN # (Federal Employer Identification Number)

		-							

Address of Utility: ______________________________ Phone: ______________

City: ______________ State: ______ Zip: ______ Fax: ______________

E-Mail: ______________________________ Web Site: ______________

Primary Regulatory Contact: ______________________________
(Name) (Title)

(1) Gross Revenues of Electric Utility……………………… $______________
(2) Gross Revenues of Gas Utility………………………….$______________
(3) Gross Revenues of Water Utility……………………… $______________
(4) Gross Revenues of Sewer Utility……………………….$______________
(5) Other Operating Revenues…………………………….$______________
*** **TOTAL GROSS REVENUES**…………………….$______________

OATH

State of…………………………)
) ss.
County of……………………..)

______________________________ being duly sworn, states that he/she is
(Officer)

______________________ of the ______________________ that the
(Official Title) (Utility Reporting)

above report of gross revenues is in exact accordance with ______________________,
(Utility Reporting)

and that such books accurately show the gross revenues of: ______________________,
(Utility Reporting)

derived from Intra-Kentucky business for the calendar year ending December 31, 20__________.

____
(Officer) (Title)

This the ______________ day of ______________________, 20________

____
(Notary Public) (County) (Commission Expires)

NOTE: **ANY DIFFERENCE BETWEEN THE AMOUNT OF THE GROSS REVENUES SHOWN IN THE ANNUAL REPORT AND THE AMOUNT APPEARING ON THIS STATEMENT MUST BE RECONCILED ON THE REVERSE OF THIS REPORT**

Exhibit 3

Attendance January 10, 2024	Rowan County Water Director Training II	
NAME	*TITLE*	*Hours*
Larry Johnson	Chairperson	3
Enoch Blair	Vice-Chair	3
Mike Collins	Secretary/Treasurer	3
Randall Cox	Board Member	3
Duane Dehart	Board Member	3
Jerry Patrick	Manager	3