

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

In the Matter of:

ELECTRONIC APPLICATION OF MUHLENBERG COUNTY )	CASE NO.
WATER DISTRICT #3 FOR AN ALTERNATIVE RATE )	2023-00400
ADJUSTMENT PURSUANT TO 807 KAR 5:076 )	

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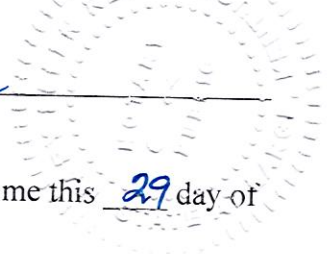
**VERIFICATION OF BEN TOOLEY**

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COMMONWEALTH OF KENTUCKY    )  
  )  
COUNTY OF     MUHLENBERG      )

Dwayne Arnett, on behalf of Muhlenberg County Water District #3, states that he has supervised the preparation of certain responses to the Request for Information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Ben Tooley  
Ben Tooley



The foregoing Verification was signed, acknowledged and sworn to before me this 29 day of February, 2024, by Ben Tooley.

Mary Ellen Reed

Commission expiration: 10-14-25  
ID# KynP36720

COMMONWEALTH OF KENTUCKY

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ELECTRONIC APPLICATION OF MUHLENBERG COUNTY )	CASE NO.
WATER DISTRICT #3 FOR AN ALTERNATIVE RATE )	2023-00400
ADJUSTMENT PURSUANT TO 807 KAR 5:076 )	

VERIFICATION OF ARIEL BAKER

COMMONWEALTH OF PENNSYLVANIA )  
 )  
 COUNTY OF CAMBRIA )

Ariel Baker, on behalf of Muhlenberg County Water District #3, states that she has supervised the preparation of certain responses to the Request for Information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

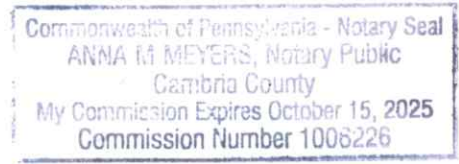
*Ariel Baker*

Ariel Baker

The foregoing Verification was signed, acknowledged and sworn to before me this 6<sup>th</sup> day of March, 2024, by Ariel Baker.

*Anna M Meyers*

Commission expiration: 10/15/25



**Muhlenberg County Water District #3**  
**Case No. 2023-00400**  
**Commission Staff's Second Request for Information**

**Witnesses:** Ben Tooley #1-6  
Ariel Baker #7

1. Refer to Muhlenberg District #3's response to Commission Staff's First Request for Information (Staff's First Request), Item 8, 8\_Board\_Members.xlsx.
  - a. Describe the insurance coverage that is provided to Muhlenberg District #3's Board of Commissioners (Board).

**Response:** In the past, the only insurance coverage that was offered to the board of commissioners was Delta Dental (dental) and EyeMed (vision). The company paid for their coverage but if they wanted to add their family then the difference was deducted from their monthly check. This was stopped in 2024. Now they pay for their own premiums. The district only has 1 commissioner that is utilizing this service and he pays his own premium out of his check now.

- b. Provide the specific monetary amounts of benefits by category provided to Muhlenberg District #3's Board during the test year. State whether benefits are single or family coverage.

**Response:** Please see attached Excel spreadsheet entitled Item #1b.xlsx for this information.

- c. Provide documentation from fiscal court approving each of the benefits for Muhlenberg District #3 Board.

**Response:** There isn't any documentation from the fiscal court approving the insurance benefits for the board.

2. Provide the following information with current medical and dental insurance premiums:

**Response:** Please see the attached spreadsheet entitled Item #2.xlsx for this information. Note, Don Garrett was replaced by Doug Anderson in 2024, so the spreadsheet reflects this change.

3. Refer to Muhlenberg District #3's response to Staff's First Request, Item 5, 5\_Total\_Wages\_Paid.xlsx, and Item 11a, Rate\_Study\_Muhlenberg\_No\_3.xlsx. Provide the current wages and annual hours for employees by position and title.

**Response:** Please find attached the spreadsheet entitled Item #3.xlsx for this information.

4. Refer to Muhlenberg District #3;s response to Staff's First Request, Item 3, 3\_Benefits\_Description.pdf.

- a. Confirm that Muhlenberg District #3 is a participant in County Employees Retirement System (CERS). If not confirmed, provide the name of the utility provided retirement plan, if any.

**Response:** This is confirmed.

- b. Describe benefit No. 7, Kentucky Public Pension Retirement.

**Response:** Ky Public Pension Retirement should have been listed as KY Public Pension Authority. CERS is part of the KPPA.

5. Refer to Muhlenberg District #3's response to Staff's First Request, Item 9, 9\_Board\_Pay\_Approval.pdf. This document does not provide the requested information and is, therefore, considered nonresponsive. Provide the fiscal court minutes approving specific monetary salaries for Muhlenberg District #3's Board or provide a statement as to why this information cannot be provided.

**Response:** Please find attached Item #5 Board pay approval.pdf. The district interprets that the judge executive's statement in the minutes that the board is authorized to collect the \$6,000 salary so long as they meet the training requirement.



6. Refer to Muhlenberg District #3's response to Staff's First Request, Item 11a, Rate\_Study\_Muhlenberg\_No\_3.xlsx, Tab ExBA. Provide the 2022 monthly billing registers for Residential, Commercial, and Wholesale.

**Response:** Please find attached in the document entitled Item #6 Billing Registers.pdf for the monthly billing summaries that includes this information.



7. Refer to the Application filed December 12, 2023, and the Revised\_Customer\_Notice.pdf., filed December 20, 2023. Explain whether Muhlenberg District #3 is requesting to establish a Wholesale Rate in this case. If so, explain why this intention was not listed in the Reasons for Application. If not, explain why a Wholesale Rate is listed several times in the application.

**Response:** Yes, Muhlenberg District #3 is requesting to establish a wholesale rate in this case. It was an oversight that the reasons for application did not include this information. The rate requested in the application is the amount included in the customer notice that went out to customers, and a revised contract with the city of Sacramento will be established upon approval of this rate.