

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

In The Matter Of:

ELECTRONIC TARIFF FILING OF THE CITY OF LANCASTER)		
TO INCREASE THE WHOLESALE RATE CHARGED TO)		CASE NO.
THE GARRARD COUNTY WATER ASSOCIATION)		2023-00424

**GARRARD COUNTY WATER ASSOCIATION’S
REQUEST FOR INFORMATION UPON THE CITY OF LANCASTER**

Comes Garrard County Water Association (“Garrard County”), by and through counsel, pursuant to the April 6, 2024 Order of the Kentucky Public Service Commission, and hereby propounds the following requests for information upon the city of Lancaster (“Lancaster”) to be answered by May 2, 2024, and in accordance with the following instructions:

I. DEFINITIONS AND INSTRUCTIONS

1. With respect to each discovery request, all information is to be divulged that is within the knowledge, possession or control of Lancaster, including its agents, employees, advisors, consultants, attorneys and/or investigators.
2. Please identify the witness(es) who will be prepared to answer questions concerning each request.
3. These requests shall be deemed continuing so as to require further and supplemental responses if Lancaster receives or generates additional information within the scope of these requests between the time of the response and the time of any final Order in this case.
4. All answers must be separately and fully stated in writing under oath.
5. Where a Request for Information calls for an answer in more than one part, each

part should be separated in the answer so that the answer is clearly understandable.

6. For purpose of these discovery requests, the following terms shall have meanings set forth below:

- (a) As used herein, “document,” “documentation” and/or “record,” whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work papers, report, diary, telegram, record, contract, agreement, study, draft, telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the

defendant and/or their agents, accountants, employees, representatives and/or attorneys. "Document" and "record" also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

- (b) The terms "relating to," "referring to," "referred to," "pertaining to," "pertained to" and "relates to" means referring to, reporting, embodying, establishing, evidencing, comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.
- (c) The terms "and," "or," and "and/or" within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.
- (d) The term "Company" shall mean Lancaster, and shall include, but is not limited to, each and every agent, employee, servant, advisor, consultant, insurer and/or attorney of Company. The term "you" shall be deemed to refer to Company.
- (e) The term "Commission" shall mean the Kentucky Public Service Commission.
- (f) To "identify" shall mean:
 - (1) With respect to a document, to state its date, its author, its type (for example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location, and the

name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

(2) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title and last known home address.

(3) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or partnership name used by that person, and the principal business address of that person.

(h) To “produce” or to “identify and produce,” shall mean that Company shall produce each document or other requested tangible thing. For each tangible thing which Company contends is privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

(i) The terms “Party or Parties” shall mean any organization, person, corporation, entity, etc., which intervened in the above-captioned proceeding and shall further include the Commission Staff; and

II. REQUESTS FOR INFORMATION

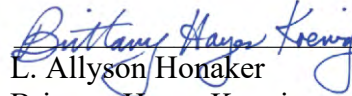
1. Refer to the Response to Commission Staff’s First Request for Information filed on January 19, 2024, Response to Question 2, which stated,

The wholesale analysis was computed based on recovery of Operating Expenses, Depreciation Expenses, and Debt Service Expenses. The retail analysis was also initially computed using the same method, based on recovery of Operating Expenses, Depreciation Expenses, and Debt Service Expenses. The Lancaster City Council requested an alternative for their consideration based on Operating Expenses and Debt Service Expenses only. **After consideration, the Council adopted wholesale rates that included Depreciation Expenses and retail rates that excluded Depreciation Expenses.** (Emphasis added) There were no other differences in the calculation methods between the retail and wholesale customers.

- 1(a) Please explain why the Council believes it is reasonable to adopt wholesale rates that include Depreciation Expenses and retail rates that exclude Depreciation Expenses.
- 1(b) Please provide an accounting of the current rates and the proposed rates for each of Lancaster's wholesale customers and the retail customers.
- 1(c) Please provide the total amount of water in gallons purchased by Garrard County in 2023, and using that total, provide the cost of that water in dollars for 2023, the cost of that total using the proposed rate and the increases proposed for the next three years.
- 1(d) Please provide the percentage of Lancaster's water supply used for each wholesale customer and the retail customers for 2023.
2. Describe any infrastructure or depreciated assets that are utilized by serving Garrard County, that are not utilized by serving retail customers.
3. Please explain whether all of assets used by retail customers have been fully depreciated.
4. Describe the cost justification for the cost of providing water to Garrard County as compared to the cost of providing water to any other wholesale customers and the retail customers.

This 12th day of April, 2024.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Garrard County Water Association, Inc.'s Request for Information to the city of Lancaster is being electronically transmitted to the Commission on April 12, 2024; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020- 00085, no hard copies of this filing will be made.



Counsel for Garrard County Water Association, Inc