

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)
KENTUCKY RURAL WATER)
ASSOCIATION FOR ACCREDITATION) CASE NO. 2024-00009
APPROVAL OF COMMISSIONER)
TRAINING AND CONTINUING)
EDUCATION CREDIT)

APPLICATION

Kentucky Rural Water Association (“KRWA” or the “Applicant”) applies for an Order from the Public Service Commission accrediting and approving a proposed water district commissioner training program for continuing education credit pursuant to KRS 74.020(6) and (7) and 807 KAR 5:070.

In support of its application, KRWA states:

1. KRWA is a non-profit corporation incorporated in the Commonwealth of Kentucky pursuant to KRS Chapter 273 on March 19, 1979, and is currently in good standing.

2. KRWA’s mailing address is: 1151 Old Porter Pike, Bowling Green, Kentucky 42103. Its email address is: j.cole@krwa.org.

3. KRWA was organized to foster professionalism in the water and wastewater industry through non-regulatory training, technical assistance programs, and advocacy. Its membership consists of water districts, water associations, municipalities

25,000 or less service connections, or other similar entities that provide water and wastewater utility services to rural Kentucky.

4. Pursuant to 807 KAR 5:001, Section 4(8),¹ copies of all orders, pleadings, and other communications related to this proceeding should be directed to:

Damon Talley
Stoll Keenon Ogden PLLC
112 North Lincoln Boulevard
PO Box 150
Hodgenville, Kentucky 42748
Telephone: (270) 358-3187
Fax: (270) 358-9560
damon.talley@skofirm.com

Janet Cole
Kentucky Rural Water Association
1151 Old Porter Pike
Bowling Green, KY 42103
(270) 843-2291
Fax: (270) 796-8623
j.cole@krwa.org

5. KRWA proposes to sponsor and conduct a water management training program on February 21, 2024, as part of our Management Conference at the Sloan Convention Center located at 1021 Wilkinson Trace, Bowling Green, Kentucky. The Program is entitled “Water District Commissioner Training.” A copy of the proposed agenda is attached to this Application at **Exhibit 1**. This program will be conducted in-person. Presenters, KRWA staff, and all attendees will abide by the COVID-19 safety protocols and social distancing measures in place at the time of the training.

¹ On January 17, 2024, KRWA gave notice pursuant to 807 KAR 5:001, Section 8, of its intent to file this application and of its use of electronic filing procedures.

6. As reflected in **Exhibit 1**, the proposed training program will include presentations on the following topics:

a. **Essential Requirements for Utilities Undergoing a PSC Inspection**

(Part 1). An understanding of the expected requirements of utilities when undergoing inspections. The presentations will address essential requirements for a positive inspection and the common deficiencies that can be avoided in order to meet regulatory standards;

b. **Essential Requirements for Utilities Undergoing a PSC Inspection**

(Part 2). Continuation of Part 1 from the Public Service Commission;

c. **Practical Suggestions for a Successful PSC Rate Adjustment Filing.**

Practical suggestions will for a successful and uneventful rate proceeding before the Public Service Commission. Topics will include frequency of rate applications, timing of a rate filing, issues to consider before preparing the application, strategies, preparing for a hearing and a discussion of common mistakes to avoid;

d. **Utility Consolidation Through Merger or Acquisition.** A detailed

overview of the step-by-step approach for evaluating a potential utility consolidation and factors to consider when assessing options. Presenter will detail the methodology for evaluating a potential consolidation;

e. **Joint Operations.** Joint Operations will be defined as an option when

considering consolidation. The value of this alternative collaboration will be detailed.

Suggestions for developing a joint management and operations agreement will be included;

f. **The Importance of Cybersecurity.** Importance of a robust cybersecurity strategy to protect utility infrastructure, ensure reliability of services, and safeguard sensitive data. A real-world example of a cyber-attack will be presented as an example of how such an attack can impact an organization, including water and wastewater utilities;

g. **Call Before You Dig: Kentucky 811.** Regulations and procedures that require individuals or entities to notify authorities before excavating or digging in a particular area. Presenter will provide a brief history of the 811 law and its changes, how the law impacts water and wastewater operators, and enforcement and penalties associated with excavation activities.

7. The proposed training program consists of six hours of instruction and should be accredited and approved as water management training satisfying the requirements set forth in KRS 74.020(7) to establish a water district commissioner's eligibility for a maximum annual salary of \$6,000. **KRWA is not requesting that the proposed training program be accredited as a program of instruction for newly appointed commissioners.**

8. A biographical statement containing the name and relevant qualifications and credentials for each presenter is attached at **Exhibit 2** of this application.

9. Not all presenters will utilize a PowerPoint for their presentation. The materials that will be provided to each attendee are attached at **Exhibit 3**. Should a presenter revise or amend his or her presentation prior to their scheduled session or provide additional materials for the attendees, KRWA will include a copy of the revised presentation with its sworn statement and report regarding the instruction.

10. KRWA will apply or will shortly apply for accreditation of the proposed training program to the Department of Environmental Protection (Operator Certification and Licensing Program).

11. KRWA has sent notice of the proposed training program by electronic mail to the water districts, water associations, and municipal utilities that are under Commission jurisdiction as well as representatives of investor-owned utilities, county judge/executives, and others who are believed to have an interest in the proposed program's subject matter.

12. KRWA will retain a record of all water district commissioners attending the proposed training program.

13. Within the Ordered number of days of the proposed training program's completion, KRWA will file with the Public Service Commission a sworn statement:

- a. Attesting that the accredited instruction was performed;
- b. Describing any changes in the presenters or the proposed program curriculum that occurred after certification; and,

c. Containing the name of each attending commissioner, their utility and the number of hours that he or she attended.

14. KRWA will include with the sworn statement documentary evidence of the program's certification by certifying authorities and a copy of any written material given to the attendees that has not been previously provided to the Public Service Commission.

15. KRWA will admit representatives of the Public Service Commission to the proposed training program at no charge to permit such representatives to assess the quality of the program's instruction, monitor the program's compliance with the Public Service Commission directives, regulations, or other requirements, or perform any other supervisory functions that the Public Service Commission deems necessary.

WHEREFORE, KRWA requests that the Commission approve and accredit the proposed training program entitled "Water Commissioner Training" for six hours of water district management training.

Dated: January 18, 2024

Respectfully submitted,



Damon R. Talley
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PO Box 150
Hodgenville, Kentucky 42748
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Counsel for Kentucky Rural Water
Association and Stoll Keenon Ogden
PLLC

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on January 18, 2024, and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.


Damon R. Talley

EXHIBIT 1

Water District Commissioner Training

Sloan Convention Center

1021 Wilkinson Trace
Bowling Green, Kentucky

Presented by

Kentucky Rural Water Association

February 21, 2024

Wednesday, February 21, 2024

Morning Sessions

- 7:55 – 8:00** **Welcome and Program Overview – Scott Young, Executive Director, Kentucky Rural Water Association**
- 8:00 – 9:00** **Essential Requirements for Utilities Undergoing a PSC Inspection (Part 1)**
Presented by the Public Service Commission
When utilities undergo inspections by the Public Service Commission (PSC), they are expected to meet certain requirements to ensure compliance and demonstrate the proper functioning of their operations. This presentation is designed to provide a comprehensive understanding of what utilities need to meet regulatory standards and avoid common deficiencies when experiencing inspections. The goal of these sessions (Part 1 and Part 2) is to empower utilities with the knowledge and tools necessary to navigate PSC inspections successfully. By understanding the essential requirements and learning from common deficiencies, utilities can not only meet regulatory standards but also contribute to the reliability and satisfaction of the services they provide to the public.
- 9:00 – 9:15** **BREAK**
- 9:15 – 10:15** **Essential Requirements for Utilities Undergoing a PSC Inspection (Part 2)**
Presented by the Public Service Commission
This is a continuation of Part 1.
- 10:30 – 11:30** **Practical Suggestions for a Successful PSC Rate Adjustment Filing**
Gerald Wuetcher, Stoll Keenon Ogden, PLLC
This presentation provides practical suggestions for a successful and uneventful rate proceeding before the Public Service Commission. Topics addressed include: frequency of rate applications, time of a rate filing, issues to consider before preparing a rate application, strategies for preparing the rate application, responding to discovery requests, dealing with Commission Staff, and preparing for a rate hearing. Presenter will also discuss common mistakes and how to avoid those mistakes.
- 11:30 – 1:00** **LUNCH BREAK**

Wednesday, February 21, 2024

Afternoon Sessions

1:00 – 1:30

Utility Consolidation Through Merger or Acquisition

Robert Miller, StraightLine KY

Utility consolidation refers to the merging or combining of various utility services. The presentation will provide a detailed overview of the step-by-step approach for evaluating a potential utility consolidation and factors to consider when assessing options. Topics will include: a definition of merger and acquisition; rationale and conditions for merging with another system; and detail the methodology for evaluating a potential consolidation.

1:30 – 2:00

Joint Operations

John Dix, Past President, Kentucky Rural Water Association

One option available to utilities when considering consolidation is Joint Operations. This session will explore the value of this alternative collaboration and will detail how it can lead to streamlined operations and overall efficiency. The session will also cover the development of an agreement and a plan for joint operations.

2:00 – 2:15

BREAK

2:15 – 3:15

The Importance of Cybersecurity

Matthew Folker, ISTT

Given the critical nature of water and wastewater services and the increasing sophistication of cyber threats, a robust cybersecurity strategy is essential to protect infrastructure, ensure the reliability of services, and safeguard sensitive data. This session will provide a real-world example of a cyber-attack, with the presenter explaining the how and why of the events; phishing; the importance of updating software; preventing ransomware; and restoring stolen data. Identifying and assessing cybersecurity risks is essential. Utilities need to understand potential threats, vulnerabilities, and the impact of a cyber-attack on their systems.

3:15 – 3:30

BREAK

3:30 – 4:30

Call Before You Dig: Kentucky 811

Patrick Donoghue, Kentucky 811

The "Call Before You Dig" law refers to regulations and procedures that require individuals or entities to notify relevant authorities before excavating or digging in a particular area. The primary goal is to prevent damage to underground utilities during excavation activities. This session will cover a brief history of the 811 law and its changes; how these laws impact compliance by water and wastewater operators; duties of the notification center; enforcement & penalties; and a roadmap for safe digging.

4:30 – 4:35

Closing Remarks – Scott Young, Executive Director, Kentucky Rural Water Association

EXHIBIT 2



John M. Dix, P.E., has served the water and wastewater utility business in South Central Kentucky since 1992 when he first joined Warren Water. He is the former General Manager of Warren County Water District, Butler County Water System, Inc. and Simpson County Water District where he remained as a consultant until retiring in December, 2023.

Dix's career also includes serving as Vice President of the regional engineering firm Cannon & Cannon, Inc., City Engineer for Bartlett, Tennessee, and as a Submarine Naval Architect for the Department of the Navy. A Civil Engineering graduate of Virginia Tech in 1982, Dix is a registered Professional Engineer in Kentucky and Tennessee.

John is a Past President of the Kentucky Rural Water Association and is the Immediate Past Chair of the Bowling Green Area Chamber of Commerce's Executive Committee.

In 2019, Dix was appointed to the state Water Resources Board by Governor Bevin and previously served as secretary for the Rochester Dam Regional Water Commission.



Patrick Donoghue is a Public Awareness and Damage Prevention Manager for Kentucky 811. In this role he serves as a liaison for members, non-members, the one call center, excavators, contractors, locators, and homeowners. Additionally, Patrick focuses on education and outreach, providing training sessions, presentations, and attending community events to educate people on the dig laws. Prior to joining Kentucky 811, Patrick spent time as a high school substitute teacher and has over 17 years of experience in law enforcement where he served as a patrol officer, training officer, school resource officer, and a member of his agency's professional standards division and training unit.



Matt Folker is the Chief Information Officer for ISTT, Inc. For the last 12 years, he has been working with businesses and government agencies in education, training and empowering others with the tools needed to keep personal data safe and the knowledge to keep cyber criminals out. His passion is to keep the state of Kentucky informed on the current regulations and technologies available to keep business moving forward.



Robert K. Miller

StraightLine Kentucky

QUALIFICATIONS

EDUCATION

Bachelors–Management and Finance, University of Louisville, 1979
Masters-Business Administration and Finance, Indiana University 1982

YEARS OF EXPERIENCE: 38

SPECIALIZATION

Senior Executive in Drinking Water, Wastewater, and Stormwater Industry

PROFESSIONAL AFFILIATIONS

American Water Works

Association QualServe Peer Reviewer

AWWA Business Practices Standards Committee Member Vice-Chair (past)

AWWA Utility Management Standards Committee Member (past)

AWWA Finance, Accounting, and Management Controls Committee Chair (past)

AWWA Management Controls Sub-Committee Chair (past)

AWWA Research Foundation Project Participating Utility Member (past)

National Association of Clean Water Agencies, Utility and Resource Management Committee (past)

Professional Profile

Senior utility executive with 38 years of experience in the drinking water, wastewater, and stormwater industry, including: executive management, strategic planning, policy development, customer service, information technology, and program management. Advocate for sustainability of water infrastructure and affordability for low-income customers. Education includes a Bachelor and Master degrees in business management and finance.

Qualifications and Experience

StraightLine Kentucky, Louisville, KY

2021 – Present Consultant

Advisor to drinking water, wastewater, and stormwater utility managers, regulatory officials, elected officials, and service providers.

City of Jackson, Mississippi

2017 – 2020 Director of Public Works

Executive management of Drinking Water, Wastewater, Stormwater, Solid Waste, Streets, Facilities, Fleet, and Warehouse operations and maintenance.

Sewerage and Water Board of New Orleans, Louisiana

2009 – 2017 Deputy Director / Interim Executive Director

Administrative management of Strategic Planning, Accounting, Budgeting, Purchasing, Customer Service, Human Resources, Information Technology, Risk Management, Fleet Maintenance, Warehouse, Internal Audit, and other operations support services.

Municipal and Financial Services Group, Maryland

2008 – 2009 Senior Manager

Management consultant to water and wastewater utilities focusing on enterprise risk management, internal control, financial analysis, and rate studies.

Louisville Water Company, Kentucky

1991 – 2008 Vice President

Administrative management of Finance, Information Technology, Risk Management, Business Planning, Human Resources, and Board Relations



Gerald E. Wuetcher

Direct Phone: 859.231.3017
gerald.wuetcher@skofirm.com

**BAR & COURT
ADMISSIONS**

Kentucky

U.S. Court Of Appeals For The
Armed Forces

U.S. District Court, Eastern
District Of Kentucky

U.S. District Court, Western
District Of Kentucky

EDUCATION

Emory University
1984, J.D.

Johns Hopkins University
1981, B.A.

Gerald E. Wuetcher

Jerry is Counsel to the Firm and a member of the Utility & Energy practice. He brings to Stoll Keenon Ogden more than 25 years of experience working at the Kentucky Public Service Commission, where he served as a staff attorney, deputy general counsel and executive advisor. He frequently appeared before the Commission in administrative proceedings involving electric, natural gas, water and sewer utility issues and represented the Commission in state and federal courts. Jerry also served as the Commission's representative in a number of interagency groups addressing water and wastewater issues. Between 2009 and 2013, he was the Commission's representative on the Board of the Kentucky Infrastructure Authority. Jerry developed and implemented the Commission's training program for water utility officials and served as an instructor for that program. He is frequent speaker on utility and local government issues before such organizations as the Kentucky Rural Water Association, Kentucky League of Cities, the Kentucky Association of Counties, and the Utility Management Institute.

Jerry served for 27 years in the United States Army as a judge advocate before retiring at the rank of Colonel in 2011. His service encompassed numerous roles on active duty and in a reserve status.

Jerry received his J.D. from Emory University in 1984, and earned his B.A. in History with Honors in 1981 from Johns Hopkins University. Jerry also serves as a member of Board of Trustees of the Woodford County Library and has previously served as an adjunct professor at the University of Louisville Brandeis School of Law.

Work Highlights

Attorney, Kentucky Public Service Commission (1987-2014). Served as a staff attorney, deputy general counsel and executive advisor. Frequently appeared before the Commission in administrative proceedings involving electric, natural gas, water and sewer utility issues and represented the Commission in state and federal courts. Responsible for drafting and revising the Commission's regulations. Served as the Commission's representative in various interagency groups addressing water and wastewater issues. Served

as the Commission's representative on the Kentucky Infrastructure Authority's Board of Directors (2009-2014). Developed the Public Service Commission's water training program for water utility officials.

Judge Advocate, U.S. Army (1984 – 2011). Served as a judge advocate in the U.S. Army on active and reserve status in numerous roles. Retired at the rank of Colonel.

Adjunct Professor of Law, University of Louisville (2011)

LOUISVILLE | LEXINGTON | INDIANAPOLIS | EVANSVILLE | FRANKFORT

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EXHIBIT 3

JOINT OPERATIONS

AN ALTERNATIVE COLLABORATION



2.21.24

JOINT OPERATIONS

WHERE TWO OR MORE
UTILITIES AGREE TO BE
MANAGED AND
OPERATED BY THE
LEAD UTILITY



CHARACTERISTICS

- EACH UTILITY MAINTAINS ITS AUTONOMY
- UTILITY BOARDS CONTINUE TO MAKE ALL DECISIONS
- ASSETS REMAIN WITH EACH UTILITY
- INDEPENDENT CUSTOMER RATES



JOINT OPERATIONS

ORGANIZATION

- Establish the Lead Utility
- One General Manager
- Develop Joint Utility Committee
 - 1-2 Representatives from each Board
 - General Manager Facilitates agenda
- Review Bylaws, Rules, & Regulations for consistency



JOINT OPERATIONS

FINANCIAL

- Each Utility pays for services used
 - Job Cost Accounting system
 - Determine Allocations for common services such as administrative, IT, GM
- Each utility has independent accounts & audits
- Recommend one Billing System



JOINT OPERATIONS

OPERATIONS

- Consolidate systems
 - SCADA
 - GIS
 - IT & Work Order management
- Evaluate Inventory



WHAT ABOUT THE MOST IMPORTANT ASSET?

THE EMPLOYEES

BEST TO HAVE ALL AS EMPLOYEES OF LEAD UTILITY

Compensation Plan, Benefits, Policies must be uniform

COMPREHENSIVE ORGANIZATIONAL STRUCTURE

Don't compartmentalize by utility – set departments by service provided





DEVELOPING A JOINT MANAGEMENT AND OPERATIONS AGREEMENT



JOINT MANAGEMENT AND OPERATIONS AGREEMENT

1. TERM- 5 YEARS RECOMMENDED
2. NO CHANGE IN OWNERSHIP
3. EACH BOARD SETS POLICIES, RULES, REGULATIONS, & RATES
4. JOINT UTILITY COMMITTEE

JOINT MANAGEMENT AND OPERATIONS AGREEMENT (CONTINUED)

5. LEAD UTILITY

6. GENERAL MANAGER

7. COMPENSATION/REIMBURSEMENT

8. SERVICES

9. TERMINATION

SUMMARY

- PROVIDES ABILITY TO SHARE EXPERTISE AFFORDABLY
- MAINTAINS IDENTITY OF UTILITY
- DOES NOT FORCE RATE ADJUSTMENTS
- SHARES EQUIPMENT AND RESOURCES

QUESTIONS?

THANK YOU!



JOHN M. DIX, P.E.



(270)784-4823



johnd@warrenwater.com





REGULATIONS & NECESSITIES

THE LAW IS HOW SAFETY IS WHY

2024 KRWA Management Conference
February 21, 2024

BUT FIRST, A DISCLAIMER...

For general informational purposes only; it is strongly recommended to obtain legal advice from a qualified professional

No legal advice is being provided and any interpretation of the law should not be derived from this information. It is highly suggested to find expert assistance for any specific queries

WHO DOES KENTUCKY 811 REPRESENT?



Natural gas distributors



Electric (distribution and transmission)



Transmission Pipelines (natural gas and petroleum)



Water and Sewer



Telecommunications and Cable



Government and Municipal


SAFETY IS YOUR PRIDE
EVERYONE EVERYTIME

KENTUCKY 811 COMPANY UPDATE

- Addition of two Damage Prevention Managers
- Membership has grown 14% (still voluntary)
- 100% Virtual Operation
- New website and webstore
- Improvements to the magazine, safety summit, and a greater social media presence.

SAFETY IS IN YOUR HANDS
EVERYWHERE YOU GO

TRANSITION UPDATE

- Transition to  took place Oct. 1, 2022
- ITICnxt Software has improved efficiency and reduced costs
- Almost 80% of inbound tickets are web tickets
- Speed of Answer ~30 seconds
- >1% Tickets returned for correction

SAFETY IS IN OUR HANDS
EVERY TIME

TICKET VOLUME UPDATE

- Over 10% increase of inbound volume (2023 v. 2022)
- The largest increase of all SOCS (Southeastern One-Call Systems) states.
- Outbound ticket ratio has gone from 5:1 down to 4:1
- This has resulted in over \$500,000 less in billing costs to members

SAFETY IS IN YOUR HANDS
EVERY TIME EVERY TIME

UNDERGROUND FACILITY DAMAGE PREVENTION ACT OF 1994

KRS 367.4901 - 367.4917



BRIEF HISTORY OF THE LAW

- CREATED IN 1994
- LAW EFFECTIVE JANUARY 1, 1995
- THE LAW HAS BEEN AMENDED SEVEN TIMES
- KENTUCKY IS THE ONLY STATE OF THE 48 CONTIGUOUS STATE THAT DOES NOT HAVE MANDATORY MEMBERSHIP



2022 LAW CHANGES

HB - 303

- Positive Response
- Working Day Definition
- Tolerance Zone
- Work Site Contact
- Utility Locate Response Time
- Unmapped or Unlocatable
- Large Projects
- 2nd Notice Request
- On-Site EXPOSED FACILITY Request
- Waiver of Liability
- Civil Penalties

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2022 LAW CHANGES



“Positive response” is an automated or written communication system provided by each member operator which facilitates the identification of underground facilities by excavators, locators, operators, etc. and obliges operators and excavators to respond and verify to satisfy their respective requirements of the Underground Facility Damage Prevention Act of 1994



“Working Day” is everyday, except weekends and holidays established by federal or state statute. A locate request must be made two days prior to commencement of digging. (ie. Locate request is submitted on Monday, work may not begin until Thursday (after positive response is obtained)



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2022 LAW CHANGES



Work site contact – means an individual that will be present at the excavation site when the excavation will occur

367.4911 (3) (c) – Name and phone number of work site contact

*****MUST BE A PERSON PRESENT AT THE WORKSITE*****

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EVERY DIE, EVERY TIME

2022 LAW CHANGES

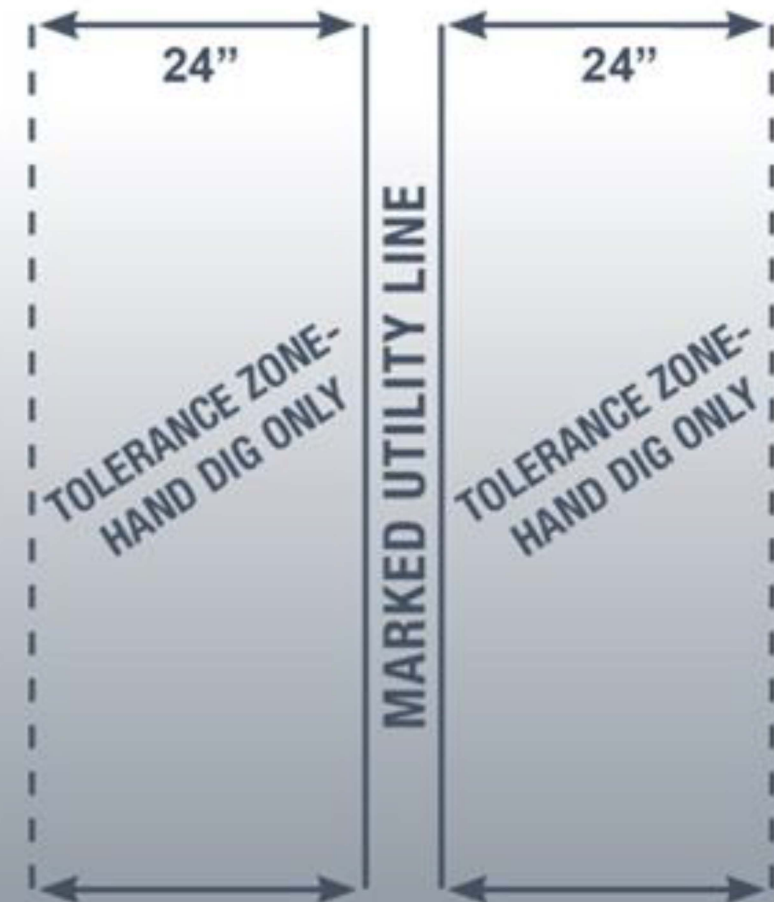
“Tolerance Zone” is a strip of land at least four (4) feet wide but not wider than the width of the underground facility plus two (2) feet on either side of the outer limits of the facility

Nonintrusive excavating methods may be used



SAVE TIME, GO ONLINE!

Whether you're a homeowner or a professional excavator, Kentucky811.org is the quickest way to submit your dig request.



2022 LAW CHANGES

Penalties – CIVIL

A violation shall be considered a first if more than one year has lapsed since the last incident

If a person commits a violation in the course and scope of employment, the penalties are imposed on the employer



SAFETY IS THE TOP PRIORITY
EVERY DAY



DEFINITIONS KRS 367.4903

(5) “Operator” means any entity or individual owning or operating underground facilities to serve the public, but does not include any entity or individual owning or operating underground storage tanks

(8) “Protection Notification Center” means an operator-provided notification center through which an excavator can contact the operator to enable the operator to provide the excavator with the approximate location of underground facilities.

(9) “Kentucky Contact Center” means Kentucky Underground Protection, Inc., (KY 811) organized as a nonprofit corporation and a multimember protection notification center providing a single telephone contact number and designated by the Kentucky Public Service Commission to be the sole recipient of 811 dialed calls through which an excavator may contact all Kentucky Contact Center members and all affected member operators may receive information to enable them to provide the excavator with the approximate location of underground facilities.

OPERATOR COMPLIANCE

Per KRS 367.4909

- (1) Each operator shall provide protection notification center access to excavators.
- (2) Voluntary operator membership in the Kentucky Contact Center shall satisfy the requirement of subsection (1) in this section.



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DUTIES OF PROTECTION NOTIFICATION CENTER

KRS 367.4913 (1) – All protection notification centers SHALL:

- (a) Provide locate request services during working days and provide an emergency contact number for incidents occurring outside the working day
- (b) Provide a positive response system to all parties to determine the status of locating an underground facility
- (c) Provide any excavation request with an identification number and the names of the facility owners or operators who will be notified
- (g) Define and adopt policies and procedures for processing design information requests
- (h) Provide the person making a design information request a list of identified operators that will receive notification

DUTIES OF PROTECTION NOTIFICATION CENTER

KRS 367.4913 (1) – All protection notification centers SHALL:

- (i) Maintain the following information provided by excavators for all requests to locate facilities for at least five (5) years from the date of the request:
 1. Name and phone number of the excavator or person requesting the underground facility locate;
 2. Location and type of work being performed by the excavator;
 3. Name and phone number of work site contact;
 4. Name, address, and phone number of underground facility operators;
and
 5. Estimated start date and start time of excavation;

DUTIES OF PROTECTION NOTIFICATION CENTER

KRS 367.4913 (1) – All protection notification centers **SHALL:**

- (j) Provide contact information for the protection notification center on its Web site or pursuant to paragraph (e) of this subsection;
- (k) Provide public awareness education and damage prevention programs in the manner and amount determined by each protection notification center.



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ENFORCEMENT AND PENALTIES

Per KRS 367.4917

- (2) A protection notification center that fails to comply with any provision of KRS 367.4913 shall be subject to a civil penalty of \$1,000 for each violation.

- (6) (7) (8) The commission (PSC) shall have statewide authority to enforce and assess civil penalties...and to seek injunctive relief for any violation that results in damage to an underground facility used to transport gas or hazardous liquid subject to the federal pipeline safety laws. Commission shall make available on its website a written agreement form for an operator and an excavator to agree to a date or series of dates by which time the locate request must be completed if different from dates established by KRS 367.4909. The commission may promulgate administrative regulations in accordance with KRS Chapter 13A to enforce the Underground Facility Damage Prevention Act of 1994.

ENFORCEMENT AND PENALTIES

Per KRS 367.4917

- (5)(c) Failure to comply with the provisions of the Underground Facility Damage Prevention Act of 1994 (KRS 367.4901 – 367.4917), may be determined at the conclusion of an investigation and shall be based on evidence available to state, county, or city officials, law enforcement, or fire protection agencies which issue the citation.

What does this mean?

State, County, and City law enforcement or fire protection agencies can initiate investigations or take enforcement action or violations, unless the PSC has already initiated an investigation or undertakes enforcement action.

SAFE DIGGING ROADMAP

PLAN

Allow time in your plans for the 811 system to function properly. Become familiar with the law: KRS 367.4901-367.4917



NOTIFY 811

Call 811 or visit: KENTUCKY811.ORG



CALL NON-MEMBERS

All utilities are not required to be a member of the 811 system in Kentucky. Each excavator must contact non-members directly.



WAIT

Wait two (2) working days excluding the day the request was made. Working day = 12:01 AM to Midnight excluding weekends and holidays.



POSITIVE RESPONSE

Kentucky law requires all utility operators to provide a status or an update of their response to your locate request.



LOCATE

Each member utility operator will respond and mark their facilities using the appropriate color based on the APWA Color Code Standard.



VERIFY

Inspect your worksite. Look for evidence of an unmarked utility facility. Call 811 again if necessary.



RESPECT

Respect the markings and observe the 24" tolerance zone that is measured from each side of the facility



DIG WITH CARE

Follow safe digging practices. Pothole and expose all marked utilities that are near your excavation site.



REPEAT

Repeat this process EVERY time you dig!



Kentucky 811

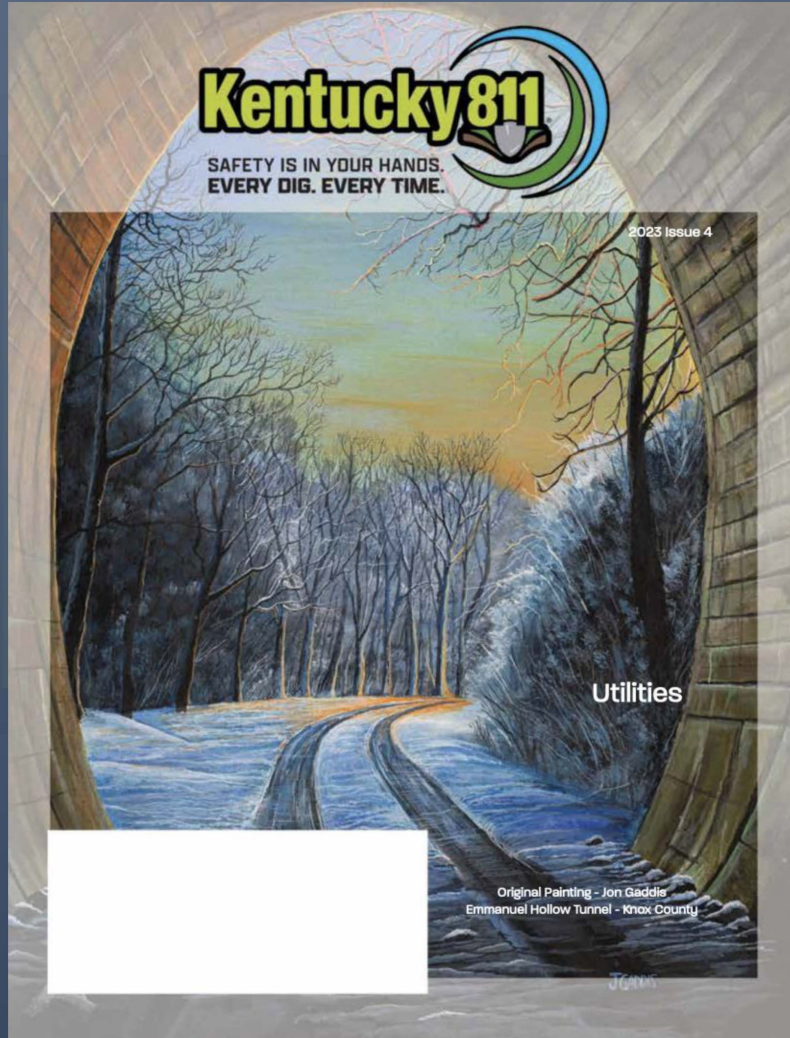


SAFETY IS IN YOUR HANDS.
EVERY DIG. EVERY TIME.

CGA BEST PRACTICES GUIDE VER. 19.0



KENTUCKY 811 MAGAZINE



Read or download all editions at www.kentucky811.org

KENTUCKY
damage prevention



SUMMIT

A CGA REGIONAL PARTNER EVENT

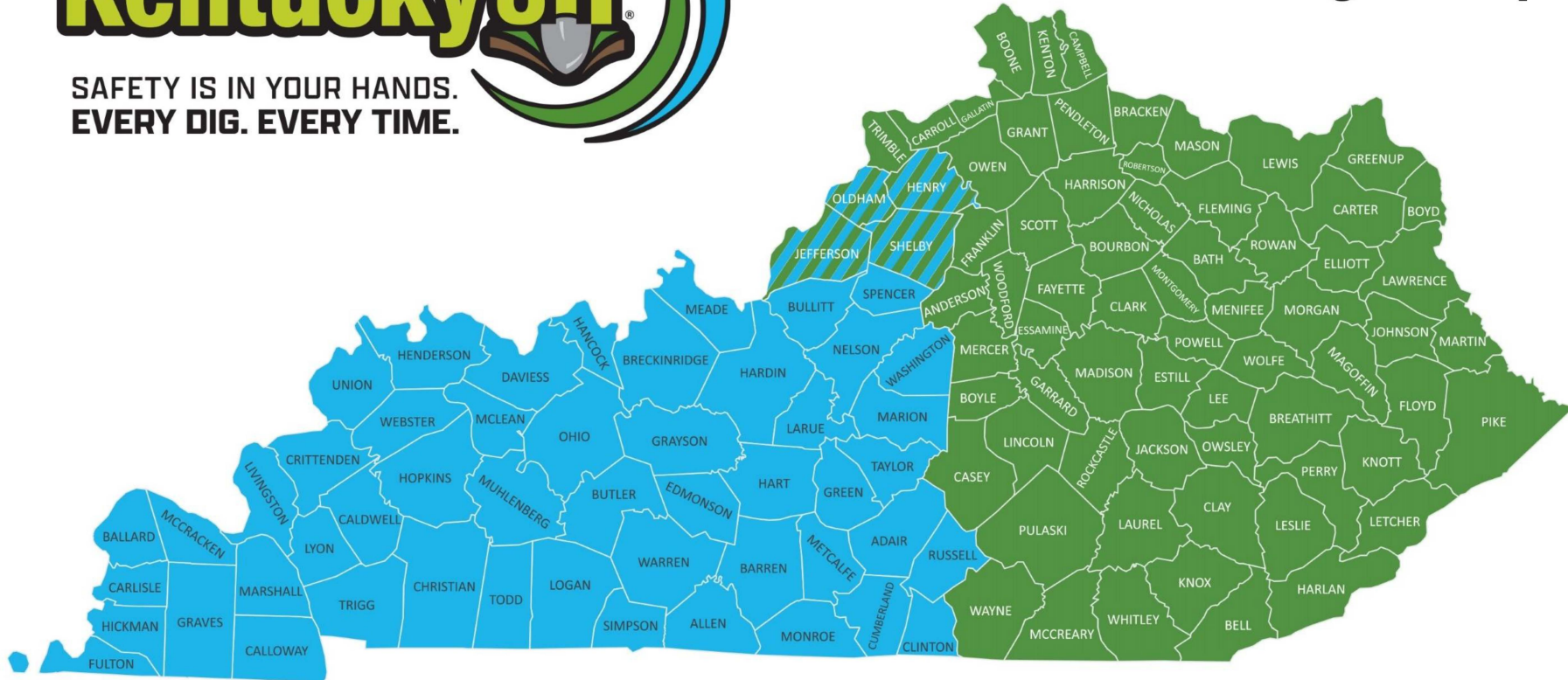
June 25-27, 2024
Embassy Suites, Lexington

Kentucky811

SAFETY IS IN YOUR HANDS.
EVERY DIG. EVERY TIME.



Damage Prevention Manager Region Map



Patrick Donoghue
Western Region
pdonoghue@ky811.com



Ms. Jamie Gaddis
Central & Eastern Region
jgaddis@ky811.com

QUESTIONS?

- RESOURCES:

- WWW.KENTUCKY811.ORG

- [HTTPS://COMMONGROUNDALLIANCE.COM](https://COMMONGROUNDALLIANCE.COM)

- [HTTPS://WWW.YOUTUBE.COM/@OCCINCVIDEOS/VIDE](https://WWW.YOUTUBE.COM/@OCCINCVIDEOS/VIDE)

OS

THANK YOU FOR YOUR TIME!

Tim Vaughn – Executive Director – tvaughn@ky811.com

Jamie Gaddis – Damage Prevention Manager (Central & Eastern Region) –
jgaddis@ky811.com

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PRACTICAL SUGGESTIONS FOR SEEKING A GENERAL RATE ADJUSTMENT FROM THE PUBLIC SERVICE COMMISSION

FEBRUARY 21, 2024

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Order of Presentation

- Planning Considerations
- Before Starting Preparation of the Application
- Preparing the Application
- Addressing Requests for Information
- Staff Report/Hearing
- Final Order and Beyond



PLANNING CONSIDERATIONS



When To File For Adjustment

- PSC Directive
- Periodic Filings (3 – 5 Years)
- Utility's Financial Condition
 - Rates Generating Sufficient Revenues?
 - Ability to Meet Debt Obligations
 - Net Losses vs. Positive Cash Flow



Revenue Requirements

CASH NEEDS METHOD (Rural Development)

Operating Expenses + **Principal** + **Interest** + **WC**

PSC METHOD – Water Districts

Operating Expenses + **Principal** + **Interest** +
Depreciation Expense + **WC**

UTILITY METHOD (IOUs)

Operating Expenses + **Interest** + **Depreciation Expense**
+ **ROI**

Difference in Approaches

- Cash Needs: CapEx recovered through Principal (No Depreciation Recovery)
- Utility Approach: CapEx recovered through Depreciation
- PSC Method (WD): CapEx **over-recovered** thru Principal **AND** Depreciation

Significance of Depreciation

“**[D]epreciation** is the loss, not restored by current maintenance, which is due to all the factors causing the ultimate retirement of the property. These factors embrace wear and tear, decay, inadequacy, and obsolescence. **Annual depreciation** is the loss which takes place in a year. In determining reasonable rates for supplying public service, it is proper to include . . . an allowance for consumption of capital . . .”

Lindheimer v. Illinois Bell Tele. Co., 292 U.S. 151, 167 (1934)



Effect of Depreciation: Example

- Assumptions:
 - Asset Purchase Price: \$1,000,000
 - Loan Principal: \$1,000,000
 - Loan Term: 40 years
 - Interest Rate: 3%
 - Asset Useful Service Life: 50 years
 - Asset Salvage Value: None
 - Annual Depreciation Expense: \$20,000

Effect of Depreciation: Example

Approach	Principal	Interest	Deprecation	Total Revenue Requirement	Recovery Period
Cash Method	\$1,000,000	\$719,330	\$0	\$1,719,330	40 years
Utility Method	\$0	\$719,330	\$1,000,000	\$1,719,330	50 years
PSC Method (Water District)	\$1,000,000	\$719,330	\$1,000,000	\$2,719,330	50 years

PSC Method Generates An Additional \$1,000,000

Timing Considerations

- Rates that fail to generate sufficient cash to meet Cash Needs will result in default – **Immediate Action Required**
- PSC Approach: Apply for adjustment when rates fail to generate revenues required by PSC Method
- Suggestion: When rates fail to generate level required by PSC Approach – Warning to Begin Work on Application



Planning for Rate Adjustment

- Continuous monitoring of financial condition and need for rate adjustment
- Incorporate ARF Forms SAO-W and RR-DC into planning and to assess financial condition
- Prepare Projections 2X yearly – short-term and long-term projections
- Projections should include known/expected adjustments
- Document results & discussion with Board



Planning for Rate Adjustment

- Document results & discussion with Board
- Consider Periodic Filings to Reduce Rate Shock and Increase Customer Acceptance
- Consider Phasing-In Rate Adjustment to allow for more gradual increases



Pre-Application Preparations



What Type of Application?

- Alternative Rate Filing
- Application Under PSC Rules of Procedure
- RD-Financing Statute
- Purchased Water Adjustment



Who Will Prepare Application?

- Type of Application
- Cost-of-Service Study Required
- Complexity of Issues/Adjustments
- Familiarity/Experience of Utility Staff with Ratemaking/KPSC Precedent



Selecting Consultant: Factors to Consider

- Accounting/Ratemaking Experience
- Familiarity with KPSC Methodology/
Ratemaking Practices/ Precedent
- Past work before KPSC
- KPSC treatment of Past Work



Is An Attorney Required?

- ARF Filings Do Not Require Attorney
- Required for Applications Under 807 KAR 5:001
- What are Expected Issues?
- Familiarity with KPSC Methodology/ Ratemaking Practices/Precedent
- Role of An Attorney



PREPARING THE APPLICATION



Preparing the Application

- Follow PSC Methodology
- Need for Cost-of-Service Study
- Need for Written Testimony
- Cost Allocations
- Provide Additional Supporting Materials
- Identifying Supporting Witnesses (ARF Applications)



Preparing the Application

- Timing Concerns
- Requesting Lower Revenue Requirement

Adjustments

- Make Adjustments to Reflect Known & Measurable Changes Regardless of Effect on Revenue Requirement
- Evaluate likelihood of Acceptance
- Proof for Proposed Adjustment
- Timing



Types of Adjustments

- Wages
- Increase Insurance/Pension/Fringe Benefits
- Property Insurance
- New Construction to be placed into Service
- Purchased Power
- Unusual Expenses
- Rate Case Expenses



Contested Issues

- Employer Contribution for Health Insurance
- Commissioner Fringe Benefits
- Donations
- Employee Bonuses
- Excessive Wage Increases
- Useful Lives of Utility Assets
- Excessive Water Loss

Skeletons In the Closet

- Debt Issuances Not Authorized
- Charging Unfiled/Unauthorized Rates
- Construction without CPCNs
- Derogatory Comments in Board Minutes
- Open Meeting Issues
- Nepotism/Non-Arms-Length Transactions
- Improper/Unlawful/Embarrassing Expenditures



Skeletons In the Closet

- Responses:
 - Make adjustments to test period expenses to remove unlawful/embarrassing expenditures
 - Correct Problems and Note the Corrections Taken when questioned
 - Report violations prior to filing application



Packaging The Application

- Make the Application easy to navigate/use
- Use Bookmarks
- Paginate Exhibits
- Hyperlinks
- Prepare an Index for Application
- Include Built-in Index for Quick Searching
- Provide Spreadsheets for Exhibits based on Spreadsheets



REQUESTS FOR INFORMATION



Responding To Requests for Information

- Expect Extensive Requests
- Answer Requests Directly
- Provide Context for Your Responses/Do not assume knowledge of past history
- Use Response to Buttress Position
- Request Clarification when necessary



STAFF REPORT/HEARING



Responding To Staff Report

- Read Report Carefully
- Identify Any Errors in Report's Calculations or Assumptions
- Identify Proposed Staff Adjustments with which Utility Disagrees
- Identify the Effect of Those Adjustments on Requested Revenue Requirement



Responding To Staff Report

- Before contesting any proposed Staff adjustment, considered the cost of delay in final decision vs. the revenue at issue and likelihood of successfully challenging
- If cost of delay is greater or challenge unlikely to succeed, accept the recommended revenue requirement level but . . .



Responding To Staff Report

- Accept only the recommended revenue requirement level and reserve right to contest the remaining issues in future proceedings
- If Staff proposes a higher level of revenue than utility proposed, notice of acceptance must be published in newspaper of general circulation
- Requesting a hearing on disputed issues will generally result in extensive delay



Responding To Staff Report

- If disputed issue is factual or resulted from “lack of evidence,” consider submitting additional evidence as part of response and requesting a conference with staff to provide additional proof
- Request a hearing on disputed issues only if utility has witnesses to support its position



Responding To Staff Report

- Request that any hearing be limited to the disputed issue
- Water Loss Surcharges



Preparation for Hearing

- (Application Under 807 KAR 5:001) Assume Hearing Will Not Be Limited to Issues Presented in Rate Application
- Witness should limit their testimony to the issues to which he/she provided testimony or response to information request



Preparation for Hearing

- Prepare Witnesses for their testimony (Mock hearing)



FINAL ORDER AND BEYOND



Final Order

- Carefully review Final Order
- Review calculations and assumptions in the Order for errors/misstatements
- Confirm that the approved rates will produce the determined revenue requirement
- Phase-In of Rates not requested



Final Order

- Application for Rehearing must be filed within 23 days of date of final order

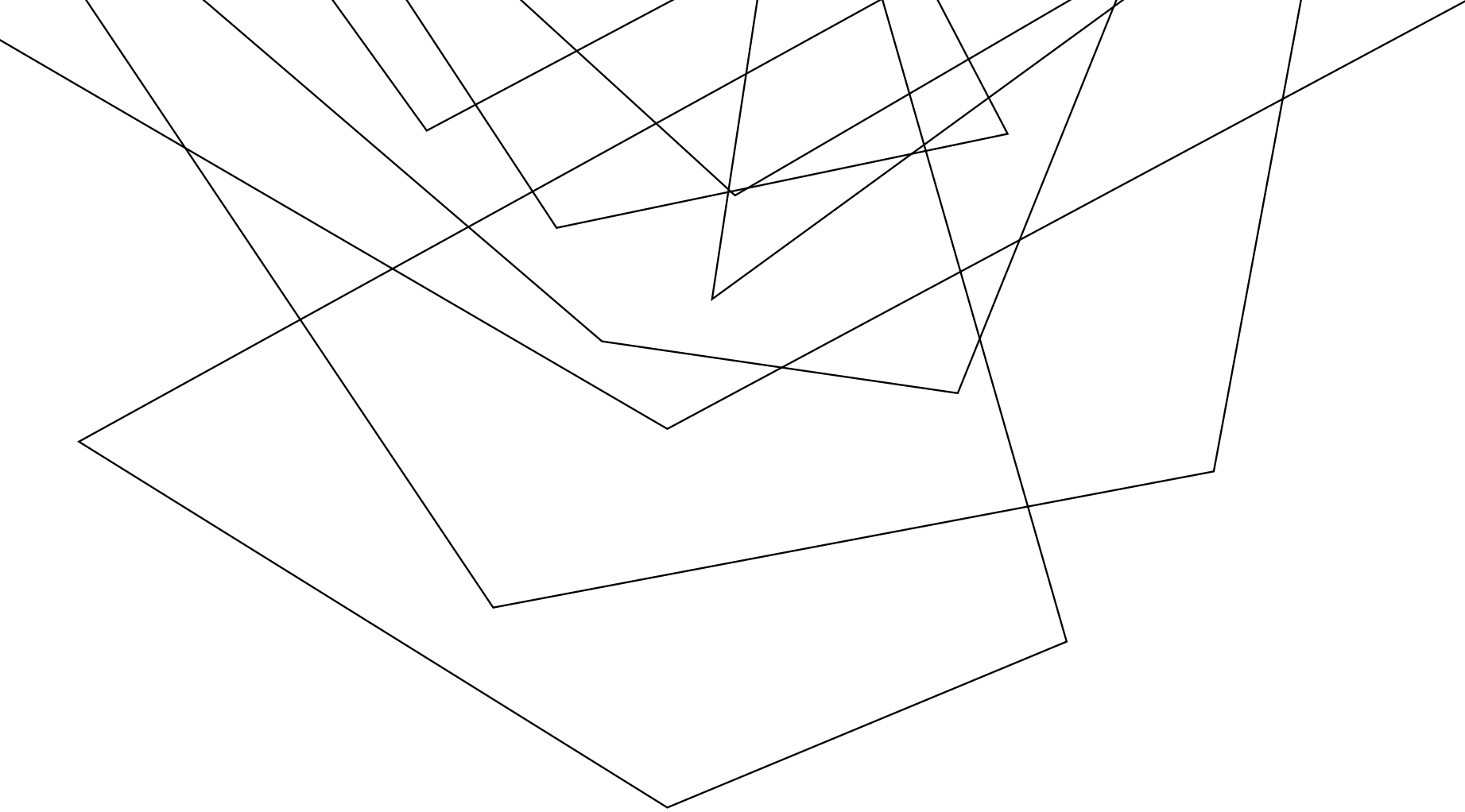


QUESTIONS?



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THE IMPORTANCE OF CYBERSECURITY

Matt Folker - ISTT. Inc.



Bowling Green KY

Established in 2003

Managed IT and Cyber Security

Local Datacenter

Serve the state of Kentucky and surrounding areas

MEET THE TEAM



Matt Folker

Cyber Security and
Compliance

12 Years with ISTT, Inc.

Married with 3 Boys

Huge Miami Dolphins Fan



David Mantlo

President/Owner

Started Company in 2003

Married with 4 Kids

Loves Hiking



Nicole Jewell

Chief Operations Officer

13 Years with ISTT, Inc.

Married with 2 Kids

Award Winning Declutter



TODAY'S TARGET COMPANY X

Manufacturing Plant in Bowling Green KY

This story is real.

Cyber Security Event in 2021

Staff names have been changed to protect their privacy

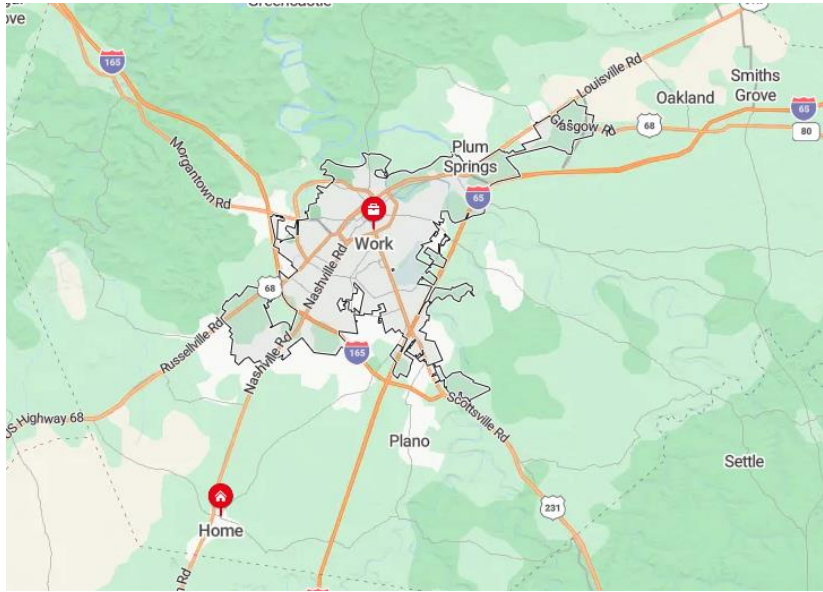
“Bill” – Company President who is about to retire

“Sarah” – Incoming company President

“Tom” – CFO

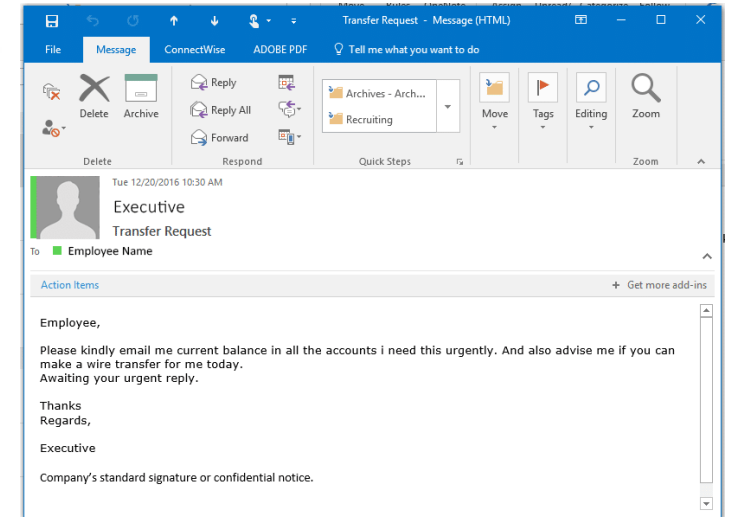
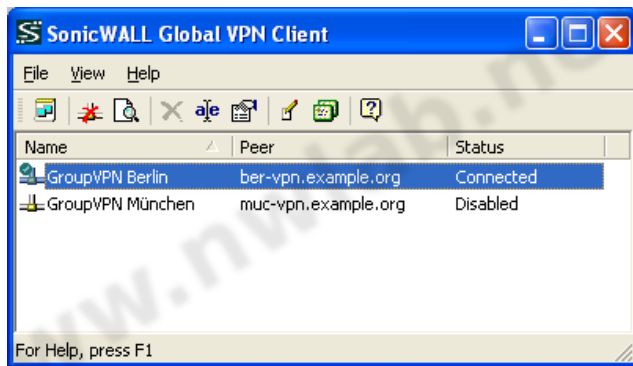
“Eric” – On Site IT Guy

DAY ZERO – FRIDAY AUGUST 20TH, 2021



Windows 7 End of Life Date:
January 14, 2020

DAY ZERO – FRIDAY AUGUST 20TH, 2021



OUT OF DATE
WINDOWS VERSION

Older versions of Windows no longer get security updates.
Known issues do not get fixed.

EMAIL PHISHING

Attackers steal your passwords by tricking you to “log in” to fake web sites.

MISSING 2FA ON
REMOTE ACCESS

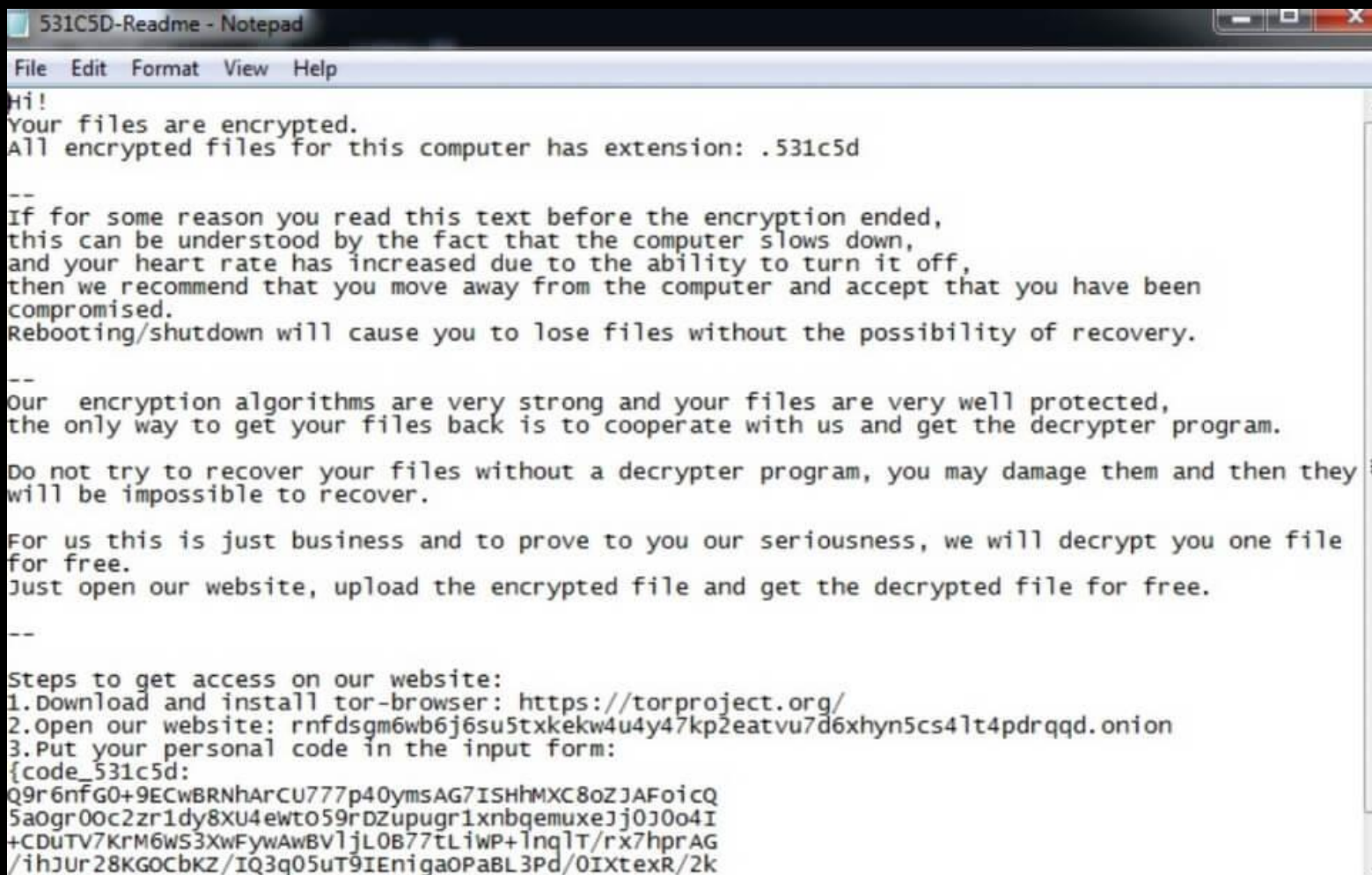
Remote access without 2FA is now required for most cyber security insurance policies and state and federal regulations (CJIS, HIPAA, SOC2, FedRAMP, etc.)

OUT OF DATE
APPLICATIONS

Similar to Windows, applications can have security flaws that require patching. These are much more difficult to manage and can require yearly purchases.

PROBLEMS – DAY 0

DAY ONE – SATURDAY AUGUST 21ST, 2021



```
531c5d-Readme - Notepad
File Edit Format View Help
Hi!
Your files are encrypted.
All encrypted files for this computer has extension: .531c5d

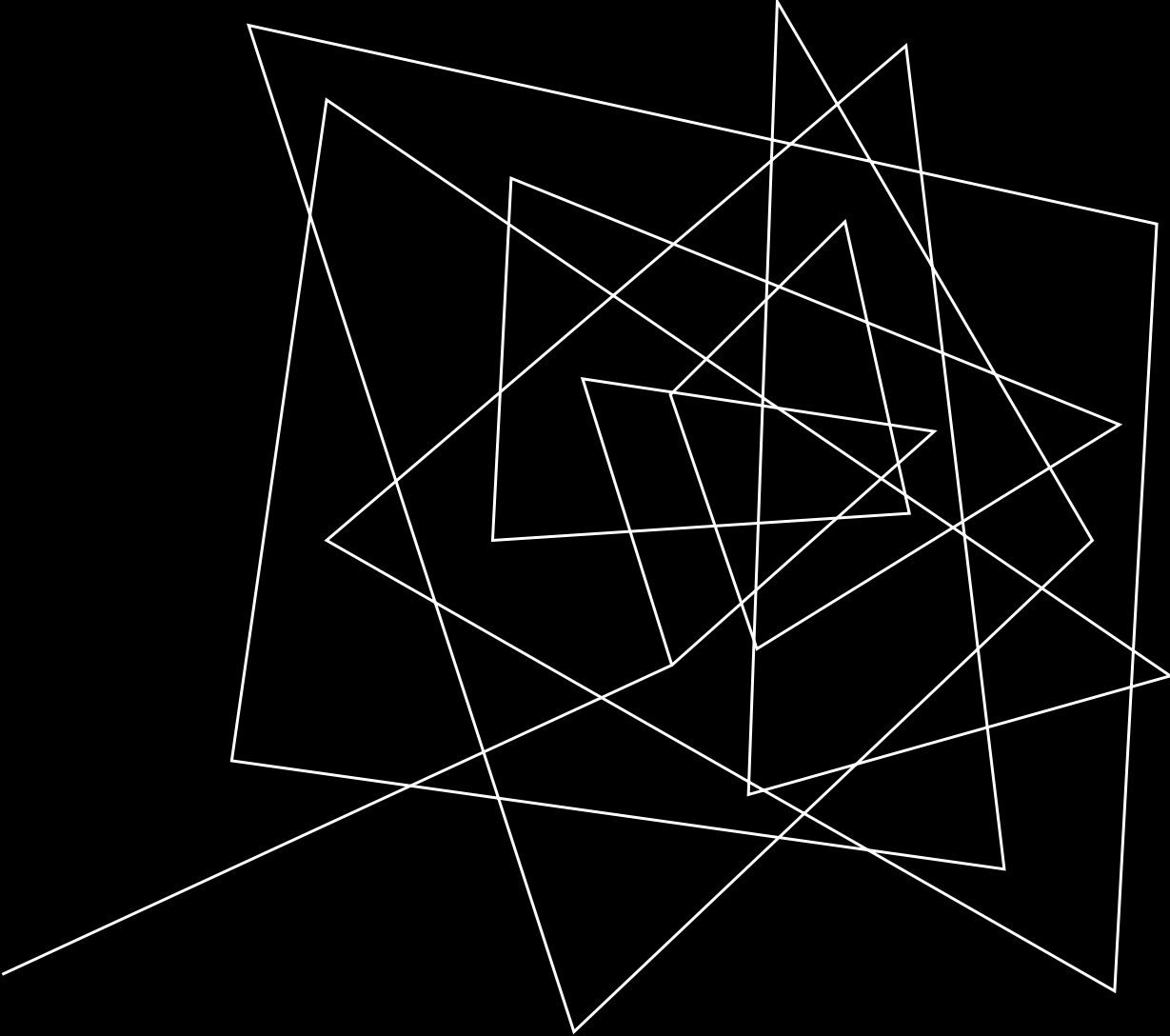
--
If for some reason you read this text before the encryption ended,
this can be understood by the fact that the computer slows down,
and your heart rate has increased due to the ability to turn it off,
then we recommend that you move away from the computer and accept that you have been
compromised.
Rebooting/shutdown will cause you to lose files without the possibility of recovery.

--
Our encryption algorithms are very strong and your files are very well protected,
the only way to get your files back is to cooperate with us and get the decrypter program.

Do not try to recover your files without a decrypter program, you may damage them and then they
will be impossible to recover.

For us this is just business and to prove to you our seriousness, we will decrypt you one file
for free.
Just open our website, upload the encrypted file and get the decrypted file for free.

--
Steps to get access on our website:
1.Download and install tor-browser: https://torproject.org/
2.open our website: rnfdsgm6wb6j6su5txkek4u4y47kp2eatvu7d6xhyn5cs4lt4pdrqqd.onion
3.Put your personal code in the input form:
{code_531c5d:
Q9r6nFG0+9ECwBRNhArCU777p40ymsAG7ISHhMXC8oZJAFoicQ
5aOgr00c2zr1dy8XU4ewtO59rDZupugr1xnbqemuxeJj0J0o4I
+CDuTV7KrM6WS3XwFyAwBVljLOB77tLiWP+lnq1T/rx7hprAG
/ihJur28KGOcbKZ/IQ3q05uT9IEnigaOPaBL3Pd/0IXtexR/2k
```



INTERNET?

Down.

EMAIL?

Down.

PRODUCTION?

Down.

SHIPPING?

Down.

RECEIVING?

Down.

PAYROLL?

Down.

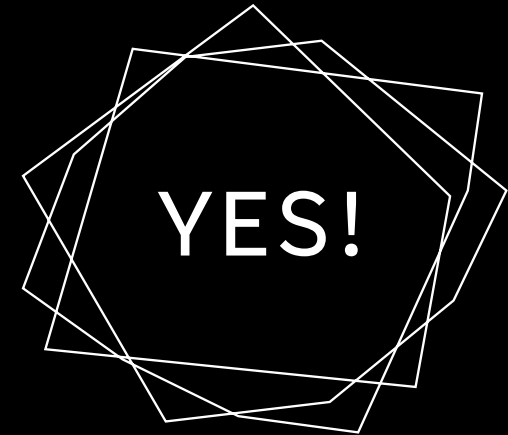
HELP?



NO CONTRACT
3RD PARTY IT
No Answer



BACKUP VENDOR
No Answer



ISTT, INC
Help is on the way!

NO BACKUPS _____ Improperly configured backups means the on-site backups were also destroyed.

NO MONITORING _____ The bad guys were on the network and no one noticed.

NO DOCUMENTATION _____ Network and Server infrastructure were not documented.

NO PLAN _____ No disaster and response plan in place.

PROBLEMS – DAY 1

DAY TWO – SUNDAY AUGUST 22, 2021

Cyber Security and Business Interruption Insurance

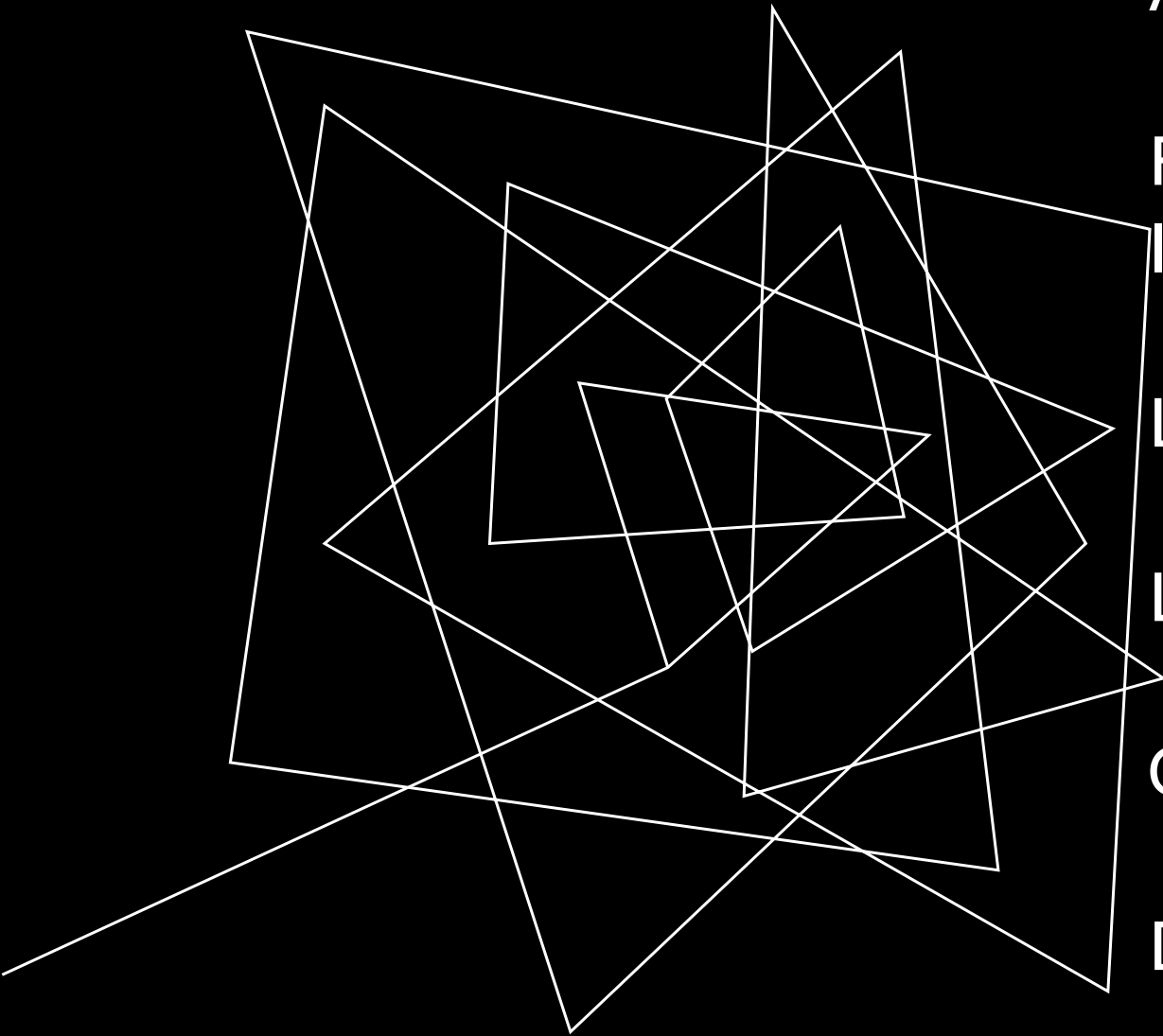
\$1 Million in Cyber Insurance

\$3 Million in Business Interruption

How long will it take to burn through
\$4 Million?

COSTS

New Servers	\$152,124.84
New Network Equipment	\$137,397.76
New Computers	\$110,280.64
Install Labor	\$158,725.00
Total	\$558,528.24



ATTORNEY FEES \$\$\$

FORENSIC INVESTIGATION \$\$\$

LOST ORDERS \$\$\$

LOST CUSTOMERS \$\$\$

CUSTOMER TRUST \$\$\$

DATA LOSS FINES \$\$\$

DAY THREE – MONDAY AUGUST 23, 2021

Not your usual Monday morning...

Leadership Team decides to send production workers back home

Shipping Team is to send out pending orders then go home when they run out of orders

No ETA is given to employees on when they can return to work, all because the backups are slow downloading.



So, What happened?

Bill, the outgoing president, was phished.

His Windows 7 computer was then compromised

Since the old Windows 7 computer was connected via VPN, the attackers were able to connect to the main site

Attackers were able to brute force the password for the user “backup” which had admin rights

Attackers uploaded data to offsite servers

Attackers encrypted files on their way out

TIME TO THINK

Phishing

What is Phishing?

- Phishing is a way to have a user type in their passwords to a fake web site.
- Users click on an email link that takes them to a malicious site.
- The malicious site sends user's input back to the criminal.
- Most people use the same password for multiple sites.

TIME TO THINK

Outdated Windows/Software

Why is updating software so important?

- Microsoft gives out date's years in advance on when an OS will no longer receive security updates
- Cyber Security teams look for vulnerabilities in 3rd party software and Windows
- Old versions of Office support micros which can be used to get remote access from an attacker

TIME TO THINK

Ransomware

What is Ransomware?

- Once an attacker is inside your network, they steal data.
- Once data is stolen, the attacker destroys the data on your network and/or servers.
- You must restore from backup or pay the ransom to get your data back.

TIME TO THINK

Ransomware

How do I prevent ransomware?

- Email Spam Filters
- Up to date AV
- Zero Trust Application Controls
- Next Generation Firewalls (NGFW)
- End User Training

TIME TO THINK

Secure Remote Access

2FA and VPN

- Who has access to what remotely?
- 2FA – something you know and something you have
- VPN connects to a remote network, but that doesn't mean its secure

TIME TO THINK

Backups

Aren't all backups the same?

- Did you purchase a backup or a recovery plan?
- What is the recovery time objective?
- What is the recovery point objective?

THE AFTERMATH

Restoration of all off-site backups took one month

Production resumed 3 weeks after the attack

Company X is now under attack every day since they were breached once before.

Insurance Costs are now 10x what they were before.

Revenue was down for the next 2 years



THANK YOU

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Utility Consolidation Through Merger or Acquisition

Robert K. Miller

Kentucky Rural Water Association

February 2024



Recommended Step-by-Step Approach for Evaluating Potential Utility Consolidation

STEP 1

STEP 2

STEP 3



Defining Merger and Acquisition



- **Merger** - utilities combine to form a new utility.
- New utility carries assets and liabilities of predecessor utilities.
- **Acquisition** - utility purchases another utility and acquired utility no longer exists as a legal entity.
- Acquiring utility purchases only assets leaving acquired utility to resolve liabilities before dissolving.

Utility Consolidation Rationale

Why **sell system or merge with**
another system?

- Regulations
- Lower rates for customers
- Mandate from elected officials or PSC



Utility Consolidation Rationale

Why **buy or merge with**
another system?

- Grow the retail service to increase sales revenues
- Economies of scale to spread expenses
- Transmission corridor to growth area
- Mandate from elected officials or PSC

To **ensure** that the consolidation supports the
intended objectives,

the utilities should **perform an assessment**

to establish the **conditions to be met**

before proceeding with consolidation

Condition #1

Systems should meet same service standards or have plans to bring them up to same standards



Water Quality



Water Pressure



Fire Protection



Main Break Frequency

Consolidation must be in best interests of customers of both systems

**Condition
#2**



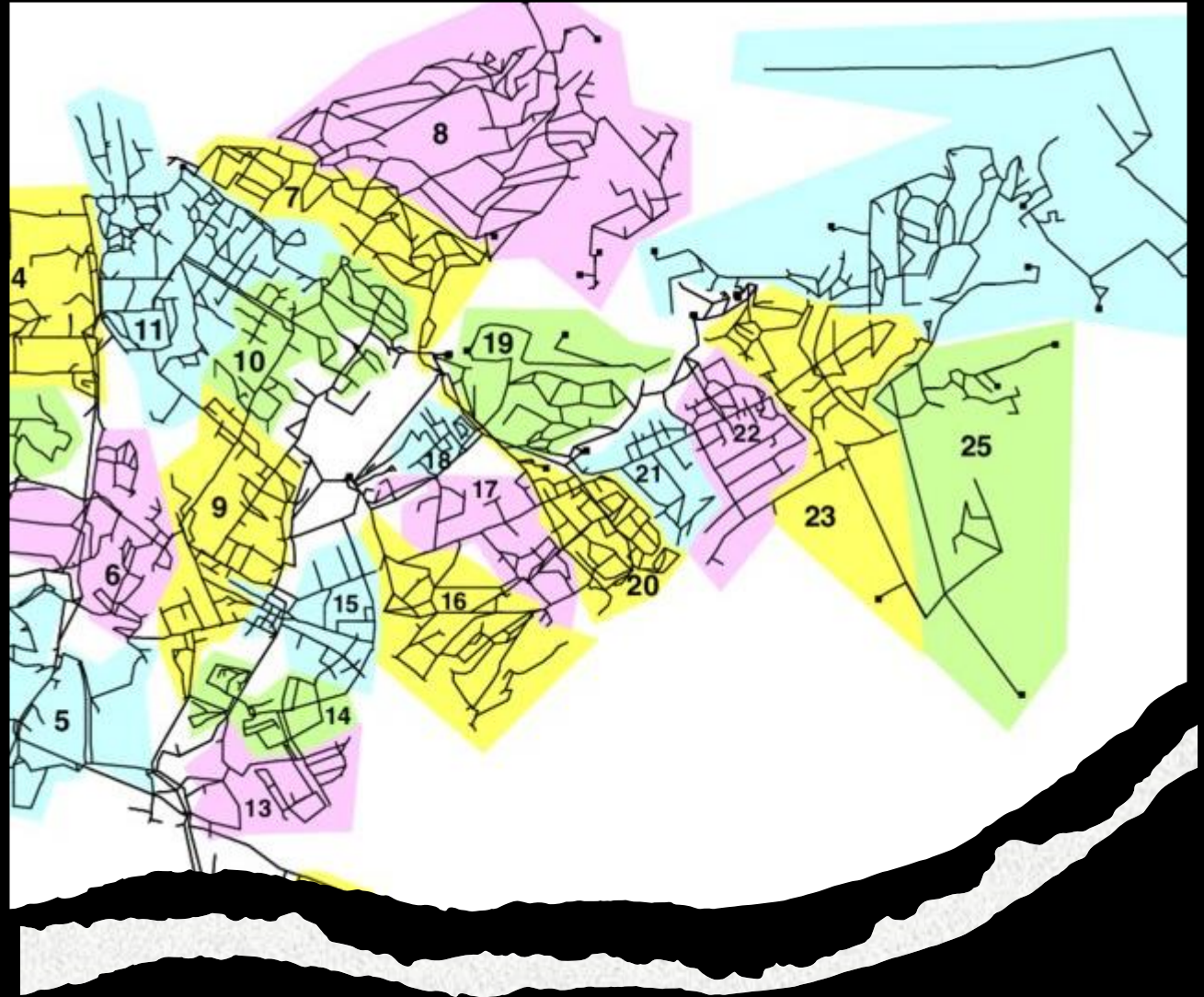
Service quality
maintained or
improved



Future rates same
or lower than if
consolidation did
not occur

Condition #3

Existing service area boundaries of systems are clearly defined



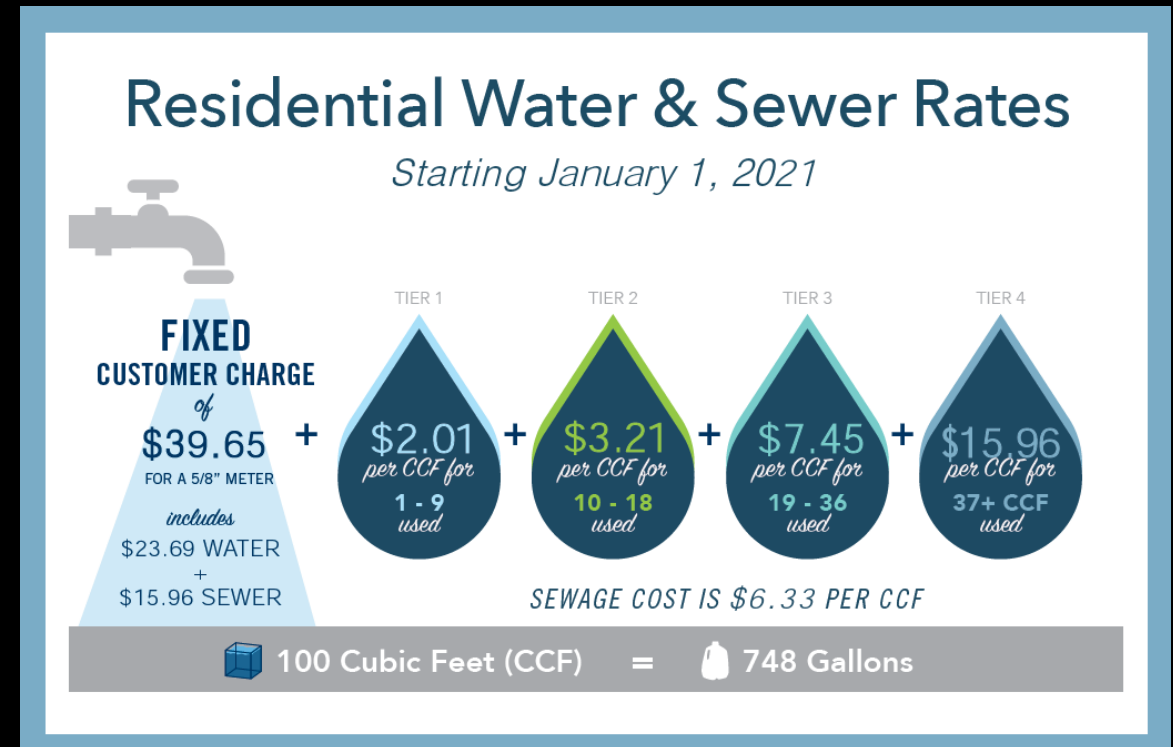


Condition #4

Acquiring system recovers cost of acquisition from benefiting customers, supplemented by Federal and State funds where available, within specified time

Condition #5

Customers of consolidated systems allowed same rates within specified time



Step-by-Step Methodology for Evaluating a Potential Consolidation

03%

500740.50	18775	
500741.50	18771.56	-4.33
500742.50	18769.39	-6.17
500743.50	18760.61	-4.78
500744.50	18754.73	-5.18
500745.90	18752.00	-2.28
500746.50	18747.50	-4.54
500747.50	18742.51	-4.99
500748.50		
500749.50		
500750.50		
500751.50		
500752.50		
500753.50		
500754.50		
500755.50		
500756.50		

4%

I. Identify and Evaluate System Records

- Service rules and rates
- Asset records
- O&M and compliance records
- Personnel policies, pay rates, and benefits
- Personnel roster



I. Identify and Evaluate System Records

- Board Minutes
- Contracts
- Debt documents and bank statements
- Software suppliers



II. Assess System Condition

- Immediate maintenance needs
- Requirements to address system deficiencies
- Anticipated infrastructure replacement needs
- Requirements for foreseeable growth

III. Establish Financial Value of Liabilities

- Investments identified in condition assessment
- Outstanding debt
- Capital commitments
- Unserved area liability



5,058	154,568	95,054	124,500
5,487	56,845	97,511	125,000
24,000	110,000	99,011	154,000
105,450	150,000	99,216	95,000
86,502	35,000	101,090	154,200
	83,000	101,684	110,000
	45,000	101,962	89,000
		102,747	50,000
		0,006	6,000
			1,000



IV. Establish Financial Value of Assets

- Utility Plant valued considering condition and maintenance history
- Cash reserves and investments at market value
- Value of future growth can be considered

V. Establish Rate Capacity to Conduct Consolidation

Rate capacity defined as

difference between the systems rates

multiplied by future water sales volume

reduced by expenses



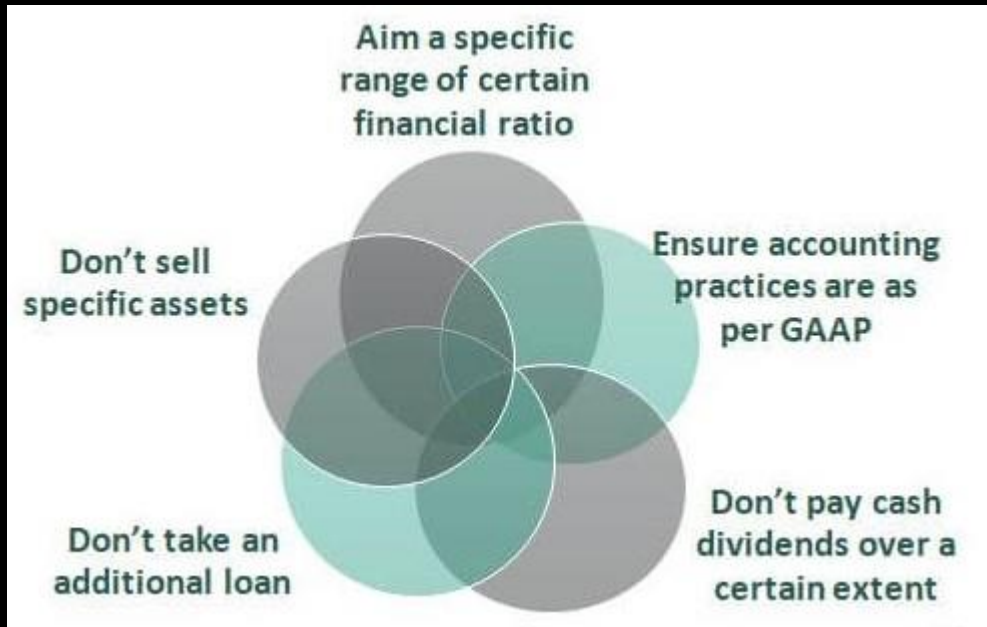
V. Establish Rate Capacity to Conduct Consolidation

- a) Value of future water sales by year in excess of expenses, holding acquired rates constant
- b) Value of future water sales by year in excess of expenses, assuming normal increases in acquiring system rates
- c) Rate capacity is difference of (a) and (b)

VI. Establish Purchase Price

- Based on value of future revenues in excess of expenses and value as transmission area to growth
- If acquisition is mandated, then purchase price should be zero

VII. Determine Resolution of Outstanding Debt



- Compute refinancing of existing debt and purchase price
- Identify unsatisfactory debt covenants in acquired system

VIII. Determine Anticipated Year For Rate Equalization

Anticipated year for rate equalization occurs when *revenue stream being acquired* equals *liability stream being incurred*

$$\text{Cash} + \text{Rate Capacity} = \text{Debt} + \text{Capital Requirements} + \text{Purchase Price}$$

If computed year is acceptable, then the deal can proceed with implementation



IX. Negotiate Contract for Transfer of Ownership



Buyer covenants use of acquired funds, service rules and regulations, timing for rate equalization, basis for rate increases, and access to board of directors

Seller representations and warranties title and authority, financial statements, litigation, environmental matters, and system boundaries



X. Prepare for Closing Deal Acquired System

- ✓ Bill of sale
- ✓ List of assets to be transferred
- ✓ Customer list
- ✓ Inventory list
- ✓ Maps
- ✓ Assignment of easements
- ✓ Opinion letter of counsel
- ✓ PSC order approving sale, if applicable

X. Prepare for Closing the Deal

Acquiring System

- ✓ Certified check or wire transfer
- ✓ Board resolution authorizing purchase and assumption of obligations
- ✓ Opinion letter of counsel
- ✓ Termination of previous agreement



XI. Prepare for Implementation

- Billing records
- Asset identification references
- Pipeline and service maps
- Maintenance records
- Easement documents

XI. Prepare for Implementation

- Develop customer information
- Communicate with fire districts
- Communicate with sewer districts
- Notify payment processors

Getting Started



Build understanding with governing boards of key issues involved with consolidation



Direct staff to begin evaluation methodology



Set a targeted completion date



Assign each component steps of evaluation methodology to specific person

Questions?