

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF)
WARREN COUNTY WATER)
DISTRICT FOR AN ADJUSTMENT) CASE NO. 2024-00200
OF RATES FOR WATER SERVICE)**

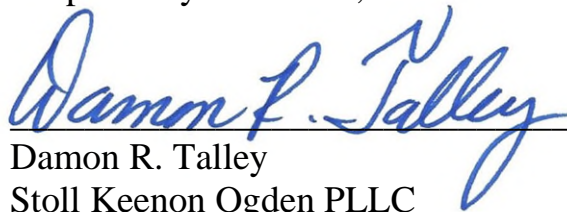
**THIRD SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S
FIRST REQUEST FOR INFORMATION**

Warren County Water District (“Warren District”) gives notice of the filing of its Third Supplemental Response to Commission Staff Request 1-14d reflecting a summary of all expenses incurred in conjunction with this proceeding as of November 27, 2024.

Previously unsubmitted supporting invoices for expenses are also attached.

Dated: November 27, 2024

Respectfully submitted,



Damon R. Talley
Stoll Keenon Ogden PLLC
P.O. Box 150
Hodgenville, KY 42748-0150
Telephone: (270) 358-3187
Fax: (270) 358-9560
damon.talley@skofirm.com

Gerald E. Wuetcher
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
Telephone: (859) 231-3017
Fax: (859) 259-3597
gerald.wuetcher@skofirm.com

Counsel for Warren County Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8 and the Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was submitted electronically to the Public Service Commission on November 27, 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

**Warren County Water District
Case No. 2024-00200**

Analysis of Cost of Case No. 2024-00200

As of November 27, 2024

Line No.	Item	Amount
1.	Accounting	\$ 0.00
2.	Engineering	\$ 35,000.00
3.	Legal	\$ 82,556.00
4.	Consultants	\$ 1,125.00
5.	Other Expenses	\$ 3,539.70
6.	Total	\$ 122,220.70

Individual Expenses to Date

Invoice	Date	Vendor	Nature of Expense	Check No.	Amount	USoA Account
1200606109	03/19/2024	HDR Engineering, Inc.	Cost-of Service Study	80836	\$ 1,750.00	186-1100-2
1200622684	05/23/2024	HDR Engineering, Inc.	Cost-of-Service Study	81626	\$12,250.00	186-1100-2
1200629533	06/14/2024	HDR Engineering, Inc.	Cost-of-Service Study	81977	\$10,500.00	186-1100-2
1200637842	07/15/2024	HDR Engineering, Inc.	Cost-of-Service Study	82338	\$10,500.00	186-1100-2
1049239	07/03/2024	Stoll Keenon Ogden PLLC	Legal Services	82180	\$ 4,322.00	186-1100-2
1052119	08/07/2024	Stoll Keenon Ogden PLLC	Legal Services	82832	\$44,975.50	186-1100-2
1054510	09/06/2024	Stoll Keenon Ogden PLLC	Legal Services	83188	\$18,615.00	186-1100-2
1057093	10/03/2024	Stoll Keenon Ogden PLLC	Legal Services	83587	\$ 8,112.50	186-1100-2
1059771	11/04/2024	Stoll Keenon Ogden PLLC	Legal Services	83878	\$ 6,531.00	186-1100-2
1	07/31/2024	John M. Dix	Consulting Services	82453	\$ 1,125.00	186-1100-2
0824	08/31/2024	Bowling Green Newsmedia, LLC	Public Notice	83268	\$ 3,539.70	186-1100-2
TOTAL					\$122,220.70	

Stoll Keenon Ogden PLLC

P.O. Box 150

112 North Lincoln Boulevard

Hodgenville, Kentucky 42748

(270) 358-3187

Tax ID # 61-0421389

Warren County Water District
jeffp@warrenwater.com

November 4, 2024
Invoice #: 1059771
Account #: 127064/182924

Re: General Rate Adjustment - Water Division 2024

Fees rendered this bill	\$ 6,531.00
Total Current Charges This Matter	\$ 6,531.00

Keep this copy for your records.

Professional Services for the period through 10/31/24, including the following:

Re: General Rate Adjustment - Water Division 2024

Our Reference: 127064/182924/DRT/2404

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
10/01/24	Reviewed PSC Staff's Third Request for Information, Item 1 and the Response to PSC Staff's 2nd Request for Information, Item 2	TCF	0.20
10/02/24	Participated in Teams meeting with client, Tina Frederick, and Emily Childress to review and assign responsibility for answering each question contained in the PSC Staff's Third Request for Information in the Water Division rate case; prepared memo to file	DRT	NO CHARGE
10/02/24	Participated in a Teams meeting with Warren District to discuss preparing the Response to PSC Staff's Third Request for Information	TCF	0.50
10/07/24	Prepared email memo to Ross Guffey re answering Question 8 of the PSC Staff's Third Request for Information for the Water Division rate case	DRT	0.10
10/07/24	Reviewed draft answer to Question 7 of the PSC Staff's Third Request for Information in the Water Division rate case; reviewed the September 19, 2024 version of the BLS publication re the new average percentages of employers' contributions to health insurance premiums; made suggested edits to the draft answer	DRT	0.40
10/07/24	Reviewed lengthy new paragraph added to the answer to Question 7 of the PSC Staff's Third Request for Information in the Water Division rate case; made suggested edits to the revised Response	DRT	0.20
10/07/24	Exchanged numerous email memos with Tina Frederick and client re information needed to answer various questions for the PSC Staff's Third Request for Information in the Water Division rate case	DRT	NO CHARGE
10/07/24	Read and reviewed the BLS September 19, 2024 News Release, notes from J. Peeples and J. Cuarta, and drafted a response to PSC Staff's Third Request for Information and sent it to D. Talley for his review	TCF	2.40
10/07/24	Reviewed documents filed in response to the first two (2) Questions of the PSC Staff's Third Request for Information and in the Butler ARF; contacted J. Peeples concerning invoices needed for the Response to PSC Staff's Third Request for Information, Item 6	TCF	0.80
10/07/24	Reviewed Item 5 of the PSC Staff's Third Request for Information, the 2021, 2022, and 2023 Warren District Annual Reports, and the Statement of Adjusted Operations; sent email query to Jeff Peeples concerning the possibility of a typo on the Statement of Adjusted Operations since the amounts for Taxes Other than Income have been relatively consistent on the last three (3) Annual Reports	TCF	0.40
10/07/24	Edited the Response to Item 3-7b of the Response to PSC Staff's Third Request for Information	TCF	0.30

Keep this copy for your records.

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
10/09/24	Reviewed first draft of the answer prepared by Ross Guffey to Question 8 of the PSC Staff's Third Request for Information in the Water Division rate case; prepared reply email memo to Ross Guffey	DRT	0.20
10/09/24	Prepared portions of Warren County Water District's Response to PSC Staff's Third Request for Information	ESC	0.70
10/09/24	Drafted a Response to PSC Staff's Third Request for Information, Item 6; created Attachment 3-6 using documents provided	TCF	0.40
10/10/24	Reviewed email memo from re draft version of Excel file to answer Question 1 of the PSC Staff's Third Request for Information; reviewed the Debt Service portion of the Excel file; conferred with Jeff re need to change the format of the Excel file	DRT	0.40
10/10/24	Participated in Teams meeting with client, Tina Frederick, and Emily Childress to discuss the status of the Responses to the PSC Staff's Third Request for Information in the Water Division rate case	DRT	NO CHARGE
10/10/24	Reviewed the draft Response prepared by Ross Guffey to Question 8 of the PSC Staff's Third Request for Information in the Water Division rate case; conferred with Ross Guffey re the AWWA industry standards for minimum usage volume for different size meters; discussed strategy for the best way to simplify the draft Response	DRT	0.50
10/10/24	Reviewed the portion of the revised version of the Excel spreadsheet in response to Question 1 of the PSC Staff's Third Request for Information pertaining to the principal and interest payments and working capital; exchanged email memos with Jeff re the need to make some edits re the labels or descriptions that he used in the Excel spreadsheet	DRT	0.40
10/10/24	Reviewed the information in the Principal and Interest Tab portion of the second revised version of the Excel spreadsheet in response to Question 1 of the PSC Staff's Third Request for Information; compared the loan descriptions, the principal payment amount, and the interest payment amount of each loan for the 2024, 2025, and 2026 calendar years as shown in the second revised spreadsheet with the Amortization Schedules for each loan filed in response to the PSC Staff's Second Request for Information; confirmed that the information is correct; prepared email memo to Jeff re the accuracy of this information	DRT	1.10
10/10/24	Exchanged numerous email memos with Emily Childress and Tina Frederick re the draft responses to some of the questions contained in the PSC Staff's Third Request for Information in the Water Division rate case	DRT	NO CHARGE
10/10/24	Conferred with client to discuss draft Response to PSC Staff's Third Request for Information; prepared portions of Response	ESC	0.40
10/10/24	Participated in a Teams meeting with Warren District and its rate consultant concerning the Response to PSC Staff's Third Request for Information	TCF	0.50

Keep this copy for your records.

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
10/11/24	Reviewed information provided by Ross Guffey to answer Question No. 8 of the PSC Staff's Third Request for Information for the Water Division; reviewed narrative response prepared by Ross Guffey; prepared reply email memo to him	DRT	0.30
10/11/24	Revised the 10-10-24 draft answer prepared by Ross Guffey to Question No. 8 of the PSC Staff's Third Request for Information in the Water Division rate case; obtained additional information needed to revise the draft Response; prepared two (2) additional paragraphs to the narrative answer to Question No. 8; forwarded revised Response to Tina Frederick and Emily Childress	DRT	1.10
10/11/24	Prepared email memo to client re additional information needed to answer Question number 4 of the PSC Staff's Third Request for Information in the Water Division rate case; inquired about the reason for allocating 100% of the CSR's wages to operation expenses instead of only 60% as was done in prior years; reviewed reply email memo from Jeff; forwarded this information to Emily Childress	DRT	0.20
10/11/24	Reviewed the near "final" version of the Response, including Exhibits and Attachments, to the PSC Staff's Third Request for Information to the Water Division rate case; prepared email memo to Emily Childress with suggested edits	DRT	0.70
10/11/24	Prepared email memo to client and forwarded the final version of the Response, including Exhibits and Attachments, to the PSC Staff's Third Request for Information in the Water Division rate case to client for his review; received approval from client to file the Response	DRT	0.20
10/11/24	Exchanged numerous other email memos with Tina Frederick and Emily Childress re various details about the Response, including Exhibits and Attachments, to the PSC Staff's Third Request for Information in the Water Division rate case	DRT	NO CHARGE
10/11/24	Reviewed the Response, Exhibits, and Attachments to the PSC Staff's Third Request for Information on the PSC website for Quality Control to make sure that Bookmarks work and that Excel files open	DRT	NO CHARGE
10/11/24	Prepared and finalized Warren County Water Division's Response to PSC Staff's Third Request for Information for filing; corresponded with D. Talley and T. Frederick re same; electronically filed PSC Transmittal Letter, Response, and accompanying Exhibits with Public Service Commission	ESC	2.60
10/11/24	Drafted narrative response based upon spreadsheet information provided by J. Peeples to Item 5 of PSC Staff's Third Request for Information; reviewed and edited the Response to Item 8; updated Item 3 based on revised information provided by J. Peeples	TCF	2.10
10/23/24	Began preparing October Rate Case Expense Report to file in Response to PSC Staff's First Request for Information, Item 14d	ESC	0.20
10/31/24	Reviewed and approved October 31, 2024 Supplemental Rate Case Expense Report in the Water Division rate case	DRT	NO CHARGE

Keep this copy for your records.

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
10/31/24	Finalized and electronically filed Warren Water Division's October Rate Case Expense Report	ESC	0.50
Total Services			\$6,531.00

Summary of Services

<u>Init</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
DRT	Talley, D R	5.80	405.00	2,349.00
ESC	Childress, Emily	4.40	320.00	1,408.00
TCF	Frederick, Tina	7.60	365.00	2,774.00
Total Services		17.80		\$6,531.00

TOTAL FEES & DISBURSEMENTS	\$6,531.00
Total Current Charges This Matter	\$6,531.00