

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)**

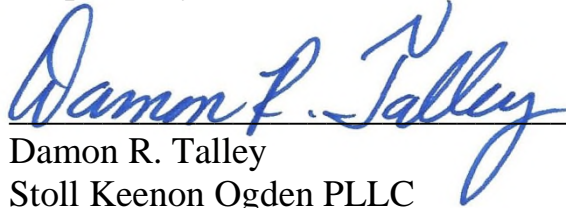
**FIRST SUPPLEMENTAL RESPONSE TO COMMISSION STAFF’S FIRST
REQUEST FOR INFORMATION**

Warren County Water District (“Warren District”) gives notice of the filing of its First Supplemental Response to Commission Staff Request 1-14d reflecting a summary of all expenses incurred in conjunction with this proceeding as of September 30, 2024.

Previously unsubmitted supporting invoices for expenses are also attached.

Dated: September 30, 2024

Respectfully submitted,



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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 September 30, 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 September 30, 2024

Line No.	Item	Amount
1.	Accounting	\$ 0.00
2.	Engineering	\$ 35,000.00
3.	Legal	\$ 67,912.50
4.	Consultants	\$ 1,125.00
5.	Other Expenses	\$ 3,539.70
6.	Total	\$ 107,577.20

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
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					\$107,577.20	



Invoice

HDR Engineering, Inc.
Lexington, KY 40202
Phone: (859) 629-4800

Reference Invoice Number with Payment

HDR Invoice No. 1200637842
Invoice Date July 15, 2024
Invoice Amount Due \$21,000.00
Payment Terms Net 30

Mr. Jacob Cuarta, General Manager
Warren County Water District
PO Box 10180
523 US 31W Bypass
Bowling Green, KY 42102

Remit to P.O. Box 74008202
Chicago, IL 60674-8202
Electronic Payment: Bank of America
Account #
Transit #
ABA #

Transmitted via Email to: jacobc@warrenwater.com

Cost of Service Water Study

Professional Services

From: June 2, 2024 To: June 29, 2024

Professional Services	Fee	Percent Complete	Fee Earned To Date	Previous Fee Invoiced	Current Fee Invoiced
Cost of Service Water Study - Water Division	35,000.00	100.00% ✓	35,000.00	24,500.00	10,500.00
Cost of Service Water Study - Sewer Division	35,000.00	100.00% ✓	35,000.00	24,500.00	10,500.00
	70,000.00		\$70,000.00	\$49,000.00	\$21,000.00
Amount Due this Invoice					\$21,000.00

HDR Internal Reference Only	
Client Number	6117
Cost Center	10079
Project Number	10392053

3/19 35,000-

5/23 24,500-

6/14 21,000-

7/15 21,000-

70,000-

51225-2 10,500-

51225-3 10,500-

Date Rec'd _____ Date Comp. _____
W.O. 51225 Cost Code _____ Dist. _____
Pur. Agt. _____ Dept. Mgr. 8 Gen. Mgr. _____

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

September 6, 2024
Invoice #: 1054510
Account #: 127064/182924

Re: General Rate Adjustment - Water Division 2024

Fees rendered this bill	\$ 18,615.00
Total Current Charges This Matter	\$ 18,615.00
Balance as of August 7, 2024	\$49,297.50
Less payments on prior billings	\$-44,975.50
Balance due on prior billings	\$4,322.00
Total Amount Due This Matter	\$22,937.00

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Professional Services for the period through 08/31/24, 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>
08/01/24	Reviewed Summary of the PSC Staff's First Request for Information in the Water Rate case prepared by Emily Childress; exchanged email memos with Emily Childress re this topic	DRT	NO CHARGE
08/01/24	Prepared email memo to client and forwarded the Summary of the questions contained in the PSC Staff's First Request for Information in the Water Rate case prepared by Emily Childress	DRT	0.10
08/01/24	Assigned responsibilities to other SKO attorneys for their part in reviewing documents and preparing narrative answers to the PSC Staff's First Request for Information in the Water Rate case; exchanged email memos with other SKO attorneys re this topic	DRT	NO CHARGE
08/01/24	Reviewed published Customer Notice to ensure accuracy of contents	ESC	0.30
08/01/24	Prepared detailed reply email memo to D. Talley's email re certification of Response to PSC Staff's First Request for Information	GEW	0.10
08/02/24	Reviewed Emily Childress' summary of PSC Staff's First Request for Information in the water rate case prior to the Teams meeting with client; reviewed some of the more lengthy questions contained in PSC Staff's First Request for Information; forwarded this summary to client before Teams meeting	DRT	0.30
08/02/24	Participated in Teams meeting with client and other SKO attorneys to review and assign responsibility for answering each of the questions contained in PSC Staff's First Request for Information in the Water rate case	DRT	NO CHARGE
08/02/24	Reviewed No Deficiency Letter received from PSC; exchanged email memos with client re the No Deficiency Letter	DRT	NO CHARGE
08/02/24	Attended Teams meeting with client, D. Talley, and T. Frederick to discuss Warren Water Division's Response to PSC Staff's First Request for Information	ESC	1.30
08/06/24	Reviewed email memo from Jeff re persons responsible for answering certain questions contained in the PSC Staff's First Request for Information; prepared reply email memo and confirmed that Jeff's understanding is correct	DRT	0.20
08/07/24	Reviewed template of the Response to PSC Staff's First Request for Information prepared by Emily Childress; made minor suggested edits to Response template; reviewed and approved revised Response template	DRT	NO CHARGE
08/07/24	Reviewed numerous documents provided by client in response to PSC Staff's First Request for Information	DRT	0.50

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
08/07/24	Exchanged numerous email memos with other SKO attorneys re assignment and acceptance of areas of responsibility concerning the preparation of the Response to the PSC Staff's First Request for Information	DRT	NO CHARGE
08/07/24	Reviewed draft response to Questions 32 and 33 of the PSC Staff's First Request for Information; reviewed email memo from client re Question 33; conferred with client re this Question; prepared additional narrative response to Question 33; discussed meaning of some of the other questions contained in the PSC Staff's First Request for Information	DRT	0.50
08/07/24	Drafted portions of WCWD Water Division's Response to PSC Staff's First Request for Information	ESC	0.80
08/07/24	Drafted responses to Items 32 and 33 of first Request for Information; sent draft of item 33 to Jeff Peeples for clarification and additional information; utilized Word and PDF documents from Warren District to enter several responses to items into the master template for the Response	TCF	2.10
08/08/24	Reviewed Long Term Debt and Short Long Term Debt spreadsheets prepared by client; prepared email memo to client re need to revise Short Term Debt spreadsheet	DRT	0.20
08/08/24	Reviewed additional documents provided by client to be used to answer some of the questions contained in the PSC Staff's First Request for Information; prepared memo to file about missing documents	DRT	0.50
08/08/24	Exchanged numerous email memos with other SKO attorneys working on preparing the Response to PSC Staff's First Request for Information; answered numerous questions posed by them	DRT	NO CHARGE
08/08/24	Reviewed two (2) email memos from HDR; reviewed numerous spreadsheets prepared by HDR to be used to answer Questions 30 and 31 of the PSC Staff's First Request for Information; conferred with Abbey at HDR re some of the spreadsheets; prepared follow-up email memo to Abbey Osborne	DRT	0.80
08/08/24	Conferred with Jerry Wuetcher re COSS documents, spreadsheets, and work papers supplied by HDR	DRT	NO CHARGE
08/08/24	Reviewed client documents and prepared portions of WCWD's Response to PSC Staff's First Request for Information	ESC	2.70
08/08/24	Reviewed documents provided by client to be used as Attachments to the Response to the PSC Staff's First Request for Information; drafted answers to some of the questions contained in the PSC Staff's First Request for Information; notified D. Talley of some missing information in the documents provided by the client; researched numerous PSC Orders to verify attendance by WCWD Board members; obtained approval for training by some of the WCWD Board members; designated some of these documents to be used as Attachments to the Response	TCF	5.10

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
08/09/24	Conferred with client in numerous phone calls re Fiscal Court Minutes, proof of Initial Training and Annual Training of Commissioners; exchanged numerous email memos with client re these documents; received Minutes of March 1998 Minutes increasing salary of water district Commissioners	DRT	0.80
08/09/24	Exchanged email memos with client re Agreement between Warren District and HDR for COSS Report and other services in connection with the water and sewer rate cases; reviewed HDR Agreement; forwarded Agreement to other SKO attorneys for filing as an Exhibit to the Response to the PSC Staff's First Request for Information	DRT	0.40
08/09/24	Prepared different Exhibits to be filed as attachments to the Response to PSC Staff's First Request for Information in the Water rate case; calculated the information needed for the Estimated Rate Case Expenses Exhibit	DRT	1.10
08/09/24	Conferred with other SKO attorneys to answer their questions re missing documents and narrative answers to some of the questions contained in the PSC Staff's First Request for Information	DRT	NO CHARGE
08/09/24	Reviewed and approved numerous draft answers to the PSC Staff's First Request for Information in the Water rate case; prepared email memo to client re a particular Exhibit	DRT	0.70
08/09/24	Exchanged numerous email memos with other SKO attorneys re proposed narrative answers to PSC Staff's First Request for Information in the Water rate case; supervised the preparation of the Response	DRT	0.10
08/09/24	Reviewed documents provided by client; drafted portions of Response to the PSC Staff's First Request for Information	ESC	1.60
08/09/24	Reviewed and revised early draft of the Response to the PSC Staff's First Request for Information; inserted information provided by client; conferred with E. Childress concerning certain outstanding documents; sent D. Talley copies of the current draft of the Response to the PSC Staff's First Request for Information in the Water rate case; included a list of items still needed from client and HDR	TCF	2.80
08/10/24	Reviewed latest draft version of Response to PSC Staff's First Request for Information in the Water Rate case	DRT	NO CHARGE
08/10/24	Prepared email memo to Jerry Wuetcher and provided list of suggested revisions to the draft Response in the Water Rate case and list of missing information	DRT	0.30
08/11/24	Reviewed and revised Response to the PSC Staff's First Request for Information; prepared certain Attachments and Exhibits for filing; corresponded with D. Talley, G. Wuetcher, and T. Frederick re status of Response	ESC	4.30
08/12/24	Participated in Teams meeting with representatives of client and other SKO attorneys to review some of the questions contained in the PSC Staff's First request for Information in the Water rate case; answered client's questions; discussed some of the draft answers to	DRT	NO CHARGE

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	some of the questions and obtained new information needed to finalize the answers and the Response; discussed documents still needed from client		
08/12/24	Reviewed numerous draft responses to many of the questions contained in the Response to the PSC Staff's First Request for Information in the Water rate case; prepared suggested revisions to some of the responses; reviewed numerous Exhibits to be filed with the Response; made numerous revisions to some of these Exhibits	DRT	2.10
08/12/24	Reviewed proposed Exhibit re Short Term Debt for Water Division prepared by client; prepared email memo to client re possible need to revise this Exhibit; exchanged follow-up email memos with client; reviewed and approved revised Exhibit re Water Division Short Term Debt	DRT	0.60
08/12/24	Exchanged numerous email memos with client re pension information for the Water Division; reviewed Warren's Policy re pensions	DRT	NO CHARGE
08/12/24	Reviewed additional email memos from clients re Exhibits prepared by client for the Response to the PSC Staff's First Request for Information in the Water rate case; reviewed list of documents yet to be provided; prepared numerous follow-up email memos to client and other SKO attorneys re the Response in the Water rate case	DRT	NO CHARGE
08/12/24	Participated in Teams meeting with client, D. Talley, G. Wuetcher, and T. Frederick to discuss status of WCWD's Response to the PSC Staff's First Request for Information; prepared memo to file after conclusion of Teams meeting	ESC	0.70
08/12/24	Prepared Warren County Water Division Response to PSC Staff's First Request for Information; prepared Attachments and Exhibits for filing; prepared Witness Verification pages for filing; compiled documents into Response; Bookmarked, OCR'ed, and optimized Response in accordance with PSC requirements; conferred and corresponded with D. Talley, G. Wuetcher, and T. Frederick re Response; prepared PSC Transmittal Letter to accompany Response	ESC	8.90
08/12/24	Reviewed and revised narrative answer to question 32 of the PSC Staff's First Request for Information; added an Exhibit provided by Jeff Peeples; made additional edits to the answer to question 1(j) of the Response; included dates of initial training and an explanation about why two (2) Board members were not required to complete the initial training; conferred with E. Childress concerning other Responses	TCF	1.50
08/12/24	Conferred with E. Childress and added a narrative statement to the response to question 11(c) of the PSC Staff's First Request for Information; made additional edits to the Response	TCF	0.50
08/13/24	Reviewed numerous documents and Exhibits provided by client for use in preparing the Response to the PSC Staff's First request for Information in the Water Rate case	DRT	0.50
08/13/24	Prepared additional narrative answers to some of the questions,	DRT	1.10

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	including Questions 5, 6a, and 6b to the PSC Staff's First Request for Information in the Water Rate case; reviewed suggested answers prepared by Emily Childress to be included in the Response		
08/13/24	Proofread near "final" version of the Response to the PSC Staff's First Request for Information in the Water Rate case; forwarded suggested edits to Emily Childress	DRT	NO CHARGE
08/13/24	Prepared email memo to client and forwarded final version of the Response to the PSC Staff's First Request for Information for its review; conferred with client re the Response; exchanged numerous email memos with client re some of the Attachments and exhibits to the Response, to get additional information, and to verify certain facts to be used in the Response; answered numerous questions posed by client re the Response and attachments	DRT	1.40
08/13/24	Reviewed the Attachments and the Exhibits to be filed with the Response to the PSC Staff's First Request for Information to verify that the latest and correct versions of the Attachments and Exhibits were being filed	DRT	0.60
08/13/24	Conferred with other SKO attorneys and exchanged numerous other email memos with SKO attorneys about the Response, Attachments, and Exhibits	DRT	NO CHARGE
08/13/24	Reviewed final version of the Response to PSC Staff's First Request for Information, the Attachments, and Exhibits for Quality Control just prior to it being filed with the PSC; verified that all Bookmarks work	DRT	NO CHARGE
08/13/24	Finalized WCWD Water Division Response to the PSC Staff's First Request for Information by incorporating feedback from client, D. Talley, and T. Frederick; reviewed Response and embedded Attachments for confidential information and redacted same; reviewed Exhibits; electronically filed Transmittal Letter, Response, and accompanying Exhibits to Public Service Commission	ESC	5.20
08/13/24	Reviewed narrative Response to PSC Staff's First Request for Information; sent E. Childress suggested edits	TCF	0.70
08/14/24	Prepared email memo to client describing next steps in Water Rate case and expected deadline for filing Response to PSC Staff's Second Request for Information	DRT	0.10
08/15/24	Reviewed PSC Order suspending the proposed Water rates and establishing the Procedural Schedule for the Water rate case	DRT	NO CHARGE
08/16/24	Reviewed Scheduling Order issued by PSC to set procedural deadlines for rate case proceeding	ESC	0.20
08/20/24	Reviewed email memo from Jeff re filing monthly financial reports during pendency of Water Rate case; prepared reply email memo to Jeff explaining that this requirement does not apply to a General Rate case which uses a Historical Test Year; reviewed follow-up email memo from Jeff	DRT	0.20

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
08/23/24	Prepared email memo to client and requested Affidavit of Publication and Tear Sheets from the newspaper re publication of the Customer Notice for the Water Rate Increase; reviewed Affidavit of Publication and Tear Sheets; prepared reply email memo to client	DRT	0.30
08/23/24	Exchanged numerous email memos with Emily Childress re need to prepare Notice of Filing of the Affidavit of Publication and Tear Sheets for the Water Customer Notice; reviewed and approved Notice of Filing before it was filed by Emily Childress	DRT	NO CHARGE
08/23/24	Drafted Notice of Filing of Proof of Publication of Customer Notice in Bowling Green Daily newspaper; compiled Notice of Filing, Affidavit of Publication, and Tear Sheets into filing; electronically filed Notice of Filing, accompanying attachments, and Transmittal Letter with Kentucky Public Service Commission	ESC	0.60
08/30/24	Reviewed PSC Staff's Second Request for Information in the Water rate case	DRT	NO CHARGE
Total Services			\$18,615.00

Summary of Services

<u>Init</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
GEW	Wuetcher, G E	0.10	405.00	40.50
DRT	Talley, D R	13.40	405.00	5,427.00
ESC	Childress, Emily	26.60	320.00	8,512.00
TCF	Frederick, Tina	12.70	365.00	4,635.50
Total Services		52.80		\$18,615.00

TOTAL FEES & DISBURSEMENTS \$18,615.00

Total Current Charges This Matter \$18,615.00

Outstanding Invoices

<u>Date</u>	<u>Invoice No.</u>	<u>Billed Amount</u>	<u>Payment/Credits</u>	<u>Balance Due</u>
07/03/24	1049239	\$ 4,322.00	\$ 0.00	\$ 4,322.00
Total Outstanding Invoices This Matter				\$4,322.00
Total Amount Due This Matter				\$22,937.00

COMBINED INVOICE AND STATEMENT



Phone: (270) 781-1700



BILLING DATE	TOTAL AMOUNT DUE	PAYMENT DUE BY
8/31/2024	9,748.37	9/10/2024
BILLING PERIOD	FROM: 8/1/2024	TO: 8/31/2024
ACCOUNT NO	Account/Invoice #	AMOUNT ENCLOSED
274175	274175/0824	

WARREN COUNTY WATER
 ALYSSA FREEMAN
 P.O. BOX 10180
 BOWLING GREEN, KY 42102 -111

By: _____

REMIT TO: BOWLING GREEN NEWSMEDIA, LLC
 PO BOX 90012
 BOWLING GREEN, KY 42101-9012

Pay by credit card: VISA MC DISC

Card #: _____

Amount Paid: _____ Exp Date: _____

Name on Card: _____

PLEASE DETACH AND RETURN UPPER PORTION WITH YOUR REMITTANCE

Date	Ref #	Pub Name	Description	Size/Quantity	Rate	Amount
BALANCE FORWARD						0.00
08/06/24	1863865	Bowling Green Daily News	Due to a scheduling conflict, 635-810-25	2.72 Inches	0.56	153.27
08/11/24	1865885	Bowling Green Daily News	ADVERTISEMENT FOR BIDS Separat 4040-772-3	8.36 Inches	0.56	177.53
08/11/24	1865887	Bowling Green Daily News	ADVERTISEMENT FOR BIDS Separat 74108-912-3	7.78 Inches	0.56	175.02
08/13/24	1858148	Bowling Green Daily News	Customer Notice Sewer Rate Adj 51225-701-3	261. Inches		5,702.85
08/13/24	1857518	Bowling Green Daily News	Customer Notice Water Rate Adj 51225-701-2	162. Inches		3,539.70

Date Rec'd _____ Date Comp 9-19-24
 W.O. _____ Cost Code _____ Dist. _____
 Pur. Agt. hp Dept. Mg CA Gen. Mgr. JL

CUSTOMER SUMMARY FOR	31 - 60 DAYS	61 - 90 DAYS	OVER 90 DAYS	CURRENT CHARGES	9,748.37
Account # 274175					
Period Ending: 8/31/2024	0.00	0.00	0.00	Past Due	0.00
Previous Balance: 0.00					
Current Charges: 9,748.37					
Payments/Credits: 0.00					
BALANCE DUE: 9,748.37				PLEASE PAY THIS AMOUNT	9,748.37