

**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 )**

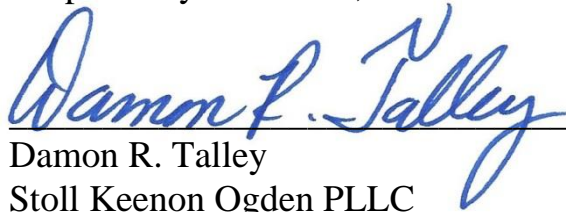
**FIFTH SUPPLEMENTAL RESPONSE TO COMMISSION STAFF’S FIRST  
REQUEST FOR INFORMATION**

Warren County Water District (“Warren District”) gives notice of the filing of its Fifth Supplemental Response to Commission Staff Request 1-14d reflecting a summary of all expenses incurred in conjunction with this proceeding as of January 31, 2025.

Previously unsubmitted supporting invoices for expenses are also attached.

Dated: January 31, 2025

Respectfully submitted,



Damon R. Talley  
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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 January 31, 2025 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

  
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Damon R. Talley

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

**Analysis of Cost of Case No. 2024-00200**

**As of January 31, 2025**

Line No.	Item	Amount
1.	<b>Accounting</b>	\$ 0.00
2.	<b>Engineering</b>	\$ 46,873.67
3.	<b>Legal</b>	\$ 97,995.00
4.	<b>Consultants</b>	\$ 1,125.00
5.	<b>Other Expenses</b>	\$ 3,539.70
6.	<b>Total</b>	\$ 149,533.37

**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
1200691623	01/29/2025	HDR Engineering, Inc.	Cost-of-Service Study		\$11,873.67	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
1062788	12/04/2024	Stoll Keenon Ogden PLLC	Legal Services	84754	\$ 232.50	186-1100-2
1065935	01/06/2025	Stoll Keenon Ogden PLLC	Legal Services	84754	\$15,206.50	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

<b>TOTAL</b>		<b>\$149,533.37</b>	
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**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

January 6, 2025  
Invoice #: 1065935  
Account #: 127064/182924

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Re: General Rate Adjustment - Water Division 2024

Fees rendered this bill \$ 15,206.50

**Total Current Charges This Matter \$ 15,206.50**

Balance as of December 4, 2024 \$232.50

Less payments on prior billings \$0.00

**Balance due on prior billings \$232.50**

**Total Amount Due This Matter \$15,439.00**

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Professional Services for the period through 12/31/24, 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>
12/02/24	Reviewed PSC Staff's Fourth Request for Information to prepare WCWD's Water Division Response	ESC	0.40
12/03/24	Participated in Teams meeting with client (Jacob & Jeff), Emily Childress, and Tina Frederick to discuss latest PSC Staff's Request for Information and to assign responsibility for answering each question	DRT	NO CHARGE
12/03/24	Participated in a planning session with Warren District, D. Talley and E. Childress concerning PSC Staff's Fourth Request for Information	TCF	0.50
12/05/24	Drafted portion of Warren County Water District's Response to PSC Staff's Fourth Request for Information	ESC	1.20
12/06/24	Reviewed client documents provided to respond to PSC Staff's Fourth Request for Information	ESC	0.20
12/09/24	Composed formal responses to items 1, 5, 7, 9, and 11 of PSC Staff's Fourth Request for Information with an attachment and an Exhibit; sent the responses to D. Talley and E. Childress for their review	TCF	6.10
12/10/24	Reviewed email memo from Jeff re status of Capital Projects listed in SAO for Water Division; reviewed Project costs and completion dates or anticipated completion dates; reviewed draft narrative answer to Questions 3a, 3b, and 3c prepared by Jeff to PSC Staff's Fourth Request for Information in the Water Division Rate case; made suggested revisions to Jeff's draft answers; prepared reply email memo to Jeff; reviewed follow-up email memo from Jeff	DRT	1.10
12/10/24	Prepared detailed email memo to Jacob and Jeff re Warren Water Division's Scholarship Program and listed series of questions re the Scholarship Program; reviewed reply email memo from Jacob with detailed answers to all my questions; prepared follow-up email memo to Jacob	DRT	0.40
12/11/24	Researched GAAP and definitions re when to "expense" certain repair items and when to capitalize them; prepared answer to Question 11 of the PSC Staff's Fourth Request for Information re capitalized expenses	DRT	1.10
12/11/24	Conferred with Tina Frederick re business purpose of some expenses and donations made by Warren County Water Division; reviewed the Excel Spreadsheet prepared by Jeff Peeples re this topic; made strategic decision re which expenses to remove from Revenue Requirements	DRT	0.80
12/11/24	Prepared first draft of answers to a few of the questions contained in PSC Staff's Fourth Request for Information	DRT	0.60

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
12/11/24	Reviewed draft answers prepared by Jacob and Jeff to some of the questions contained in the PSC Staff's Fourth Request for Information; made suggested revisions to these narrative answers; reviewed draft answers prepared by Tina Frederick to some of the questions contained in the PSC Staff's Fourth Request for Information	DRT	1.30
12/11/24	Reviewed and revised Response to PSC Staff's Fourth Request for Information in the Water Division rate case	ESC	1.20
12/11/24	Prepared formal responses to items 2, 4, 8, 12 and 13 of PSC Staff's Fourth Request for Information; conferred with D. Talley about the presentation of the response for Item 13; made edits to the response to Item 11 following D. Talley receiving additional information	TCF	4.90
12/11/24	Reviewed and revised the narrative answers to Items 3 and 13 of the Response to PSC Staff's Fourth Request for Information	TCF	0.70
12/12/24	Reviewed the pdf version of the Response to PSC Staff's Fourth Request for Information for Quality Control; reviewed all the Invoices and other Exhibits and attachments to be filed with the Response; exchanged numerous additional email memos with Tina Frederick re the Response to the PSC Staff's Fourth Request for Information	DRT	NO CHARGE
12/12/24	Reviewed latest version of the incomplete Response to PSC Staff's Fourth Request for Information in the Water Division rate case; prepared revised answers to some of the questions contained in the PSC Staff's Fourth Request for Information; prepared answer to Question 14 of the PSC Staff's Fourth Request for Information	DRT	1.60
12/12/24	Reviewed first complete version of the Response to the PSC Staff's Fourth Request for Information; made list of suggested revisions to this version of the Response; prepared email memo to Tina Frederick and provided rationale for some of the suggested edits and revisions	DRT	1.10
12/12/24	Reviewed and approved revised version of the Response to PSC Staff's Fourth Request for Information following additional revisions suggested by clients and made by Tina Frederick	DRT	0.50
12/12/24	Made additions and edits to Items 3 and 13 of the Response to PSC Staff's Fourth Request for Information; reviewed certain formatting of the document for consistency; sent completed draft to D. Talley for comprehensive review	TCF	2.50
12/12/24	Made final edits to Response to PSC Staff's Fourth Request for Information and sent the document and signature pages to J. Cuarta and J. Peoples for review	TCF	0.20
12/13/24	Exchanged email memos with Emily Childress re additional tasks to perform for Warren Water Division's rate case	DRT	NO CHARGE
12/13/24	Reviewed first draft of revised Statement of Adjusted Operations (SAO) for Warren District's Water Division; made suggested edits to revised SAO; reviewed portions of PSC record in rate case to determine list of additional adjustments to make to SAO; prepared	DRT	1.10

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	lengthy email memo to Emily Childress with list of additional adjustments to make to SAO		
12/13/24	Prepared initial draft of revised Statement of Adjusted Operations to include additional adjustments to revenue requirement calculation as identified in Warren County's Responses to Requests for Information from PSC Staff	ESC	1.80
12/13/24	Made final review of Response to ensure all documents were OCR'd; bookmarked the Response; filed Warren District's Response to PSC Staff's Fourth Request for Information with the PSC	TCF	0.20
12/16/24	Exchanged series of email memos with Emily Childress re revising Supplemental (Revised) Statement of Adjusted Operations (SAO) for the Water Division rate case; reviewed and made suggested revisions to three (3) versions of the Supplemental SAO for the Water Division	DRT	1.10
12/16/24	Reviewed the Schedule of Principal and Interest Payments contained in the initial PSC Application, in the original Statement of Adjusted Operations (SAO), and in the later Responses to PSC Staff's Request for Information; made note of need to revise SAO to incorporate the most current schedule of Principal and Interest Payments and need to calculate the average annual Principal and Interest Payments based upon 2024, 2025, and 2026 payments	DRT	1.30
12/16/24	Revised Statement of Adjusted Operations to include additional adjustments to revenue requirement calculation as identified in Warren County's Responses to Requests for Information from PSC Staff; drafted Notice of Filing to explain new adjustments	ESC	2.10
12/17/24	Reviewed email memo from Emily re the amount of the average Principal and Interest payments for the Water Division rate case if the principal payments for the RWFA 2022D and 2024D loans are excluded; confirmed Emily's calculations; prepared follow-up email memo to Emily Childress and authorized her to proceed with revising the Water Division Statement of Adjusted Operations (SAO) without including the principal payments on these two (2) loans	DRT	0.70
12/17/24	Revised Statement of Adjusted Operations to account for revisions to Principal & Interest Payments and Debt Service Coverage amounts	ESC	0.40
12/18/24	Reviewed and approved latest revisions to the Statement of Adjusted Operations for the Water Division rate case; reviewed and approved the latest version of the Notice of Filing for the Water Division rate case; prepared lengthy email memo to client explaining Supplemental Statement of Adjusted Operations and the narrative description of the various changes to the Statement of Adjusted Operations in the Water Division rate case	DRT	1.30
12/18/24	Revised Supplemental Statement of Adjusted Operations and Notice of Filing; exchanged emails with D. Talley re same	ESC	1.20
12/19/24	Exchanged email memos with Jacob and Jeff re the Notice of Filing and Supplemental SAO in the Water Division rate case	DRT	NO CHARGE

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
12/23/24	Reviewed email memo from Jeff re minor, technical corrections to be made to the Supplemental Statement of Adjusted Operations for the Water Division; prepared follow-up email memo to Jeff re these suggested changes and whether the narrative list of changes in the Notice of Filing needs to be revised; reviewed reply email memo from Jeff; prepared another follow-up email memo to Jeff and Jacob	DRT	0.50
12/23/24	Exchanged numerous email memos with Emily Childress re the changes suggested by Jeff to the Supplemental Statement of Adjusted Operations; discussed the need to prepare updated Rate Case Expense Report	DRT	NO CHARGE
12/23/24	Prepared December Rate Case Expense Report; revised Supplemental Statement of Adjusted Operations and Notice of Filing documents to incorporate comments from Mr. Peeples; corresponded with D. Talley re same	ESC	1.20
12/27/24	Reviewed the latest version of the Rate Case Expense Report for the Water Division rate case and which will be filed with the PSC on December 30, 2024; approved the Rate Case Expense Report; prepared email memo to Emily Childress approving the Report and authorizing her to file the Report with the PSC on December 30, 2024	DRT	0.20
12/27/24	Reviewed the latest version of the Supplemental Statement of Adjusted Operations (SAO) for the Water Division rate case; checked the accuracy of the calculations	DRT	0.60
12/27/24	Reviewed the latest version of the Notice of Filing of the Supplemental SAO in the Water Division rate case; reviewed the narrative information contained in the Notice of Filing to verify that all of the changes to the SAO were included in the Notice of Filing and the rationale for these changes	DRT	0.50
12/27/24	Prepared email memo to Emily Childress and approved the Notice of Filing of the Supplemental SAO in the Water Division rate case	DRT	NO CHARGE
12/30/24	Electronically filed December Rate Case Expense Report with Public Service Commission; finalized and electronically filed Notice of Filing of Supplemental Statement of Adjusted Operations	ESC	0.60
<b>Total Services</b>			<b>\$15,206.50</b>

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**Summary of Services**

<u>Init</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
DRT	Talley, D R	15.80	405.00	6,399.00
ESC	Childress, Emily	10.30	320.00	3,296.00
TCF	Frederick, Tina	15.10	365.00	5,511.50
Total Services		41.20		\$15,206.50

TOTAL FEES & DISBURSEMENTS \$15,206.50

**Total Current Charges This Matter \$15,206.50**

**Outstanding Invoices**

<u>Date</u>	<u>Invoice No.</u>	<u>Billed Amount</u>	<u>Payment/Credits</u>	<u>Balance Due</u>
12/04/24	1062841	\$ 232.50	\$ 0.00	\$ 232.50
<b>Total Outstanding Invoices This Matter</b>				<b>\$232.50</b>
<b>Total Amount Due This Matter</b>				<b>\$15,439.00</b>



# Invoice

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

Reference Invoice Number with Payment

HDR Invoice No. 1200691623  
Invoice Date January 29, 2025  
Invoice Amount Due \$23,915.32  
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: [REDACTED]

Transmitted via Email to: jacobc@warrenwater.com

## Cost of Service Water Study

### Professional Services

From: June 30, 2024 To: December 28, 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	35,000.00	0.00
Cost of Service Water Study - Sewer Division	35,000.00	100.00%	35,000.00	35,000.00	0.00
	<b>110,000.00</b>		<b>\$93,915.32</b>	<b>\$70,000.00</b>	<b>\$0.00</b>

### Hourly Professional Services

Name	Title	Hours/Qty	Billing Rate	Current Fee Invoiced
<b>Cost of Service Water Study-Water Division-HNTE   Not to Exceed \$20,000.00   Total Invoiced to Date \$11,873.67</b>				
Lisa Gibson	Administrative/Accounting	0.75	136.67	102.50
Ross Guffey	Project Manager	38.00	180.64	6,864.32
Abbey Osbourne	Water/Wastewater EIT	42.10	114.88	4,836.45
Asshika Uppala	Intern Engineering	1.00	70.40	70.40
				<b>\$11,873.67</b>

<b>Cost of Service Water Study-Sewer Division-HNTE   Not to Exceed \$20,000.00   Total Invoiced to Date \$12,041.65</b>				
Ross Guffey	Project Manager	41.00	180.64	7,406.24
Abbey Osbourne	Water/Wastewater EIT	40.35	114.88	4,635.41
				<b>\$12,041.65</b>

**\$23,915.32**

**Total Hourly Professional Services \$23,915.32**

**Amount Due this Invoice \$23,915.32**

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