

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF)
WARREN COUNTY WATER)
DISTRICT FOR AN ADJUSTMENT) CASE NO. 2024-00201
OF RATES FOR SEWER SERVICE)**

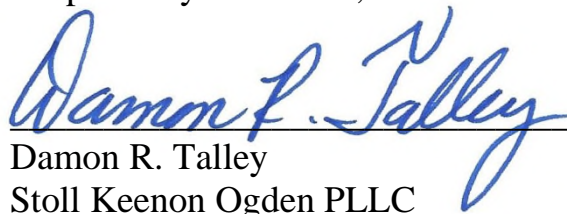
**FIRST SUPPLEMENTAL RESPONSE TO COMMISSION STAFF’S FIRST
REQUEST FOR INFORMATION**

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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Stoll Keenon Ogden PLLC
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Hodgenville, KY 42748-0150
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Fax: (270) 358-9560
damon.talley@skofirm.com

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Stoll Keenon Ogden PLLC
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Lexington, Kentucky 40507-1801
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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 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. 2024-00201**

Analysis of Cost of Case No. 2024-00201

As of September 30, 2024

Line No.	Item	Amount
1.	Accounting	\$ 0.00
2.	Engineering	\$ 35,000.00
3.	Legal	\$ 62,974.50
4.	Consultants	\$ 1,125.00
5.	Other Expenses	\$ 5,702.85
6.	Total	\$ 104,802.35

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	186-1100-3
1200622684	05/23/2024	HDR Engineering, Inc.	Cost-of-Service Study	81626	\$12,250.00	186-1100-3
1200629533	06/14/2024	HDR Engineering, Inc.	Cost-of-Service Study	81977	\$10,500.00	186-1100-3
1200637842	07/15/2024	HDR Engineering, Inc.	Cost-of-Service Study	82338	\$10,500.00	186-1100-3
1049241	07/03/2024	Stoll Keenon Ogden PLLC	Legal Services	82180	\$ 3,582.00	186-1100-3
1052120	08/07/2024	Stoll Keenon Ogden PLLC	Legal Services	9300	\$36,788.00	186-1100-3
1054511	09/06/2024	Stoll Keenon Ogden PLLC	Legal Services	9329	\$22,604.50	186-1100-3
1	07/31/2024	John M. Dix	Consulting Services	82453	\$ 1,125.00	186-1100-3
0824	08/31/2024	Bowling Green Newsmedia, LLC	Public Notice	83268	\$ 5,702.85	186-1100-3
TOTAL					\$104,802.35	



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 #: 1054511
Account #: 127064/182925

Re: General Rate Adjustment - Sewer Division 2024

Fees rendered this bill	\$ 22,604.50
Total Current Charges This Matter	\$ 22,604.50

Keep this copy for your records.

Professional Services for the period through 08/31/24, including the following:

Re: General Rate Adjustment - Sewer Division 2024

Our Reference: 127064/182925/DRT/2404

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
08/01/24	Reviewed Sewer Rate Application on PSC website; reviewed numerous Exhibits to the Application on PSC website to verify that they were properly uploaded and Bookmarked	DRT	NO CHARGE
08/01/24	Reviewed Summary of the PSC Staff's First Request for Information in the Sewer 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 Sewer 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 Sewer 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 responses to D. Talley's email re certification of responses 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 Sewer 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 Sewer rate case	DRT	NO CHARGE
08/02/24	Participated in Teams meeting with client, D. Talley, and T. Frederick to discuss Warren Sewer Division's responses to PSC Staff's First Request for Information	ESC	1.40
08/06/24	Reviewed No Deficiency Letter from PSC on Sewer Rate case Application; prepared email to client re No Deficiency Letter	DRT	NO CHARGE
08/06/24	Prepared response template for Response to PSC Staff's First Request for Information	GEW	2.30
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	DRT	0.40

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	PSC Staff's First Request for Information		
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	Drafted portions of WCWD Sewer Division's Response to PSC Staff's First Request for Information	ESC	0.80
08/07/24	Prepared portions of the Response to the PSC Staff's First Request for Information	GEW	0.80
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 to be filed in response to Question 16 of PSC Staff's First Request for Information	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	0.40
08/08/24	Reviewed two (2) email memos from HDR; reviewed numerous spreadsheets prepared by HDR to be used to answer Questions 31 and 32 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	0.60
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	Prepared additional portions of the Response to PSC Staff's First Request for Information	GEW	3.50
08/09/24	Prepared different Exhibits to be filed as attachments to the Response to PSC Staff's First Request for Information in the Sewer rate case; calculated the information needed for the Estimated Rate Case Expenses Exhibit for the Sewer rate case	DRT	1.20
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 in the Sewer rate case	DRT	NO CHARGE
08/09/24	Reviewed and approved numerous draft answers to the PSC Staff's First Request for Information in the Sewer rate case	DRT	0.60
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 Sewer rate case; supervised the preparation of the Response	DRT	NO CHARGE
08/09/24	Exchanged multiple email memos with Ross Guffey re some of the responses to the PSC Staff's First Request for Information in the Sewer rate case; conferred with him to obtain additional information	DRT	0.40

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
08/09/24	Prepared answers to additional questions contained in the PSC Staff's First Request for Information; reviewed and revised initial draft version of Response to the PSC Staff's First Request for Information	GEW	6.80
08/09/24	Researched the history of KRS 74.020(8) to obtain the date the requirement of 12 hours of training within one year of initial appointment became effective in an effort to make the response to the PSC Staff's First Request for Information as detailed as possible	TCF	0.40
08/09/24	Checked SKO's Collab-space for updates to documents from client, but did not locate the initial appointment of T. Kanally; emailed Alyssa at Warren to ask about obtaining the document for inclusion in the Response	TCF	0.20
08/09/24	Added responses to the master template for the Response to the PSC Staff's First Request for Information in the Sewer Division case using information filed in the Collab-space; contacted D. Talley and E. Childress concerning a lack of information needed to draft a response to the subparts of Item 4 in the Sewer Request for the PSC Staff's First Request for Information	TCF	1.70
08/10/24	Reviewed latest draft version of Response to PSC Staff's First Request for Information in the Sewer 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 Sewer Rate case and list of missing information	DRT	0.30
08/11/24	Reviewed answers prepared by D. Talley to some of the questions contained in the PSC Staff's First Request for Information; reviewed Exhibits provided by other SKO attorneys and client; reviewed and revised the latest version of the Response to the PSC Staff's First Request for Information	GEW	9.10
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 Sewer rate case; answered client's questions; discussed some of the draft answers to some of the questions and obtained new information needed to finalize the answers and the Response; discussed documents still needed from client	DRT	NO CHARGE
08/12/24	Reviewed proposed Exhibit re Short Term Debt for Sewer Division prepared by client; reviewed details of 2024D Bonds re Warren's new Short Term Debt; 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 Sewer Division Short Term Debt	DRT	0.70
08/12/24	Exchanged numerous email memos with client re pension information for the Sewer 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	DRT	NO CHARGE

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	Information in the Sewer 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 Sewer rate case		
08/12/24	Exchanged numerous email memos with Gerald Wuetcher re some of the draft answers to the PSC Staff's First Request for Information in the Sewer rate case; reviewed and approved the draft answers; suggested additional language to be added to the answer in another question	DRT	NO CHARGE
08/12/24	Reviewed and revised latest version of the Response to the PSC Staff's First Request for Information; prepared numerous Exhibits to be included in the Response; added additional narrative answers suggested by other SKO attorneys	GEW	10.50
08/12/24	Reviewed latest version of the Sewer Response to the PSC Staff's First Request for Information; sent G. Wuetcher narrative answer to be included in the Response to the PSC Staff's First Request for Information	TCF	0.30
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 Sewer Rate case; prepared email memo to client re questions about some of the documents	DRT	0.60
08/13/24	Reviewed and proofread 8-13-24 version of the Response to the PSC Staff's First Request for Information in the Sewer Rate case; forwarded suggested edits to Jerry Wuetcher	DRT	NO CHARGE
08/13/24	Made additional revisions to the Response to the PSC Staff's First Request for Information; exchanged numerous email memos with D. Talley re the Response, Attachments, and the Exhibits; made revisions to some of the Exhibits and Attachments; inserted the Attachments into the Response to the PSC Staff's First Request for Information	GEW	7.80
08/13/24	Reviewed latest draft of Sewer Response and sent D. Talley a list of typos and other information	TCF	0.80
08/14/24	Reviewed 8-14-24 version of Response to PSC Staff's First Request for Information prepared by Jerry Wuetcher complete will all Attachments and Exhibits	DRT	0.80
08/14/24	Reviewed email memo from client with suggested revisions to the Response to PSC Staff's First Request for Information; reviewed and approved changes made by client to a few of the Exhibits and Attachments	DRT	0.40
08/14/24	Exchanged numerous email memos with client and Jerry Wuetcher re final revisions to the Response, including the Attachments and Exhibits to PSC Staff's First request for Information	DRT	NO CHARGE
08/14/24	Prepared email memo to client describing next steps in Sewer Rate case and expected deadline for filing Response to PSC Staff's Second Request for Information	DRT	0.10
08/14/24	Reviewed Response; made final revisions to the Response to the	GEW	2.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	PSC Staff's First Request for Information; made Warren County Water District's requested revisions to the Response; Bookmarked the Response and all Attachments; prepared PSC Transmittal Letter; uploaded the Response to the PSC Staff's First Request for Information to the PSC website; uploaded the Exhibits to the PSC website		
08/15/24	Reviewed PSC Order suspending the proposed Sewer rates and establishing the Procedural Schedule for the Sewer rate case	DRT	NO CHARGE
08/23/24	Prepared email memo to client and requested Affidavit of Publication and Tear Sheets from newspaper re publication of the Customer Notice for the Sewer rate increase; reviewed Affidavit of Publication and Tear Sheets for Sewer rate increase; 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 Sewer 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 Sewer rate case	DRT	NO CHARGE

Total Services

\$22,604.50

Summary of Services

<u>Init</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
GEW	Wuetcher, G E	42.90	405.00	17,374.50
DRT	Talley, D R	7.40	405.00	2,997.00
ESC	Childress, Emily	3.10	320.00	992.00
TCF	Frederick, Tina	3.40	365.00	1,241.00
	Total Services	56.80		\$22,604.50

TOTAL FEES & DISBURSEMENTS \$22,604.50

Total Current Charges This Matter \$22,604.50

John M. Dix

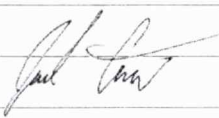
INVOICE

671 Winningham Road
Crossville, TN 38572-3108

INVOICE #	DATE
1	7/31/2023 <i>2024</i>

BILL TO
Jacob Cuarta, General Manager
Warren County Water District
P.O. Box 10180
Bowling Green, KY 42102

CUSTOMER ID	TERMS
1	net 30

DESCRIPTION	QTY	UNIT PRICE	AMOUNT
PSC Response - Consulting Hours 7/25/2024	3	150.00	450.00
PSC Response - Consulting Hours 7/26/2024	6	150.00	900.00
PSC Response - Consulting Hours 7/27/2024	2	150.00	300.00
PSC Response - Consulting Hours 7/28/2024	1	150.00	150.00
PSC Response - Consulting Hours 7/29/2024	3	150.00	450.00
			-
			-
			-
07/31/2024			-
51225/701/2			-
51225/701/3			-
Please split between water/sewer			-
			-
			-

Thank you for your business!

SUBTOTAL	2,250.00
TOTAL	\$ 2,250.00

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. Jc

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