

**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 )**

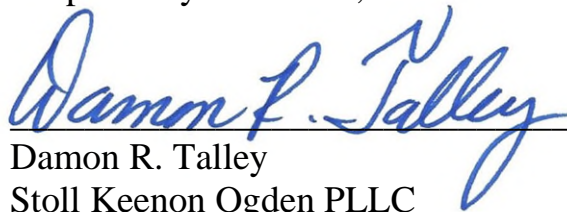
**SECOND SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION**

Warren County Water District (“Warren District”) gives notice of the filing of its Second Supplemental Response to Commission Staff Request 1-14d reflecting a summary of all expenses incurred in conjunction with this proceeding as of October 31, 2024.

Previously unsubmitted supporting invoices for expenses are also attached.

Dated: October 31, 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 October 31, 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 October 31, 2024**

Line No.	Item	Amount
1.	<b>Accounting</b>	\$ 0.00
2.	<b>Engineering</b>	\$ 35,000.00
3.	<b>Legal</b>	\$ 72,475.00
4.	<b>Consultants</b>	\$ 1,125.00
5.	<b>Other Expenses</b>	\$ 5,702.85
6.	<b>Total</b>	\$ 114,302.85

**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
1057094	10/03/2024	Stoll Keenon Ogden PLLC	Legal Services	9353	\$ 9,500.50	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
<b>TOTAL</b>					<b>\$114,302.85</b>	

**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

October 3, 2024  
Invoice #: 1057094  
Account #: 127064/182925

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Re: General Rate Adjustment - Sewer Division 2024

Fees rendered this bill	\$ 9,500.50
<b>Total Current Charges This Matter</b>	<b>\$ 9,500.50</b>

**Keep this copy for your records.**

Professional Services for the period through 09/30/24, 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>
09/02/24	Reviewed email memo from Emily Childress; reviewed Summary of PSC Staff's Second Request for Information for the Sewer Division rate case; prepared reply email memo to Emily Childress	DRT	0.20
09/02/24	Reviewed PSC Staff's Second Set of Requests for Information; began drafting WCWD Sewer Division Responses to Data Requests; corresponded with D. Talley and T. Frederick re same	ESC	0.90
09/03/24	Participated in Teams meeting with client representatives, Emily Childress, and Tina Frederick to discuss and assign primary responsibility for answering each question contained in the PSC Staff's Second Request for Information in the Sewer Division rate case	DRT	NO CHARGE
09/03/24	Participated in Teams meeting with D. Talley, T. Frederick, Jeff Peeples, and Jacob Cuarta to discuss responses to PSC Staff's Second Request for Information; drafted portion of Response to Second Request for Information for the Sewer Division Rate Case	ESC	0.60
09/05/24	Searched internet and contacted PSC staff to obtain Depreciation Table for Useful Life of Sewer Assets; emailed Depreciation Table to Mr. Peeples	TCF	0.70
09/06/24	Participated in Teams meeting with client, Ross Guffey and Abbey Osborne with HDR, and Emily Childress to review the questions to the PSC Staff's Second Request for Information in the Sewer rate case for which HDR will be fully responsible or partially responsible for answering	DRT	0.60
09/06/24	Participated in Teams meeting with D. Talley, Jeff Peeples, Ross Guffey, and Abbey Osborne to discuss responses to PSC Staff's Second Request for Information	ESC	0.70
09/09/24	Reviewed email memo from Abbey Osborne at HDR re suggested answers to some of the questions in the PSC Staff's Second Request for Information in the Sewer rate case; reviewed the documents and Excel files provided by her; prepared reply email memo to Abbey Osborne	DRT	0.30
09/09/24	Exchanged numerous email memos with Emily Childress re responses to the PSC Staff's Second Request for Information in the Sewer rate case	DRT	NO CHARGE
09/09/24	Reviewed the revised Excel Spreadsheet containing the Water Billing Analysis; verified that the "glitch" for the 5/8 meters has been fixed	DRT	0.20
09/10/24	Conferred with Jeff re the useful life of the sewer tap (see Question 13 of the PSC Staff's Second Request for Information); prepared email memo to Emily Childress re the proposed answer which Jeff	DRT	0.20

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	plans to prepare		
09/10/24	Exchanged numerous email memos with Emily Childress re other documents provided by client in response to the PSC Staff's Second Request for Information in the rate case for the Sewer Division	DRT	NO CHARGE
09/10/24	Prepared portions of Warren County Sewer Division's Response to PSC Staff's Second Request for Information	ESC	0.60
09/11/24	Prepared for the Teams meeting with client to discuss the proposed Response to the PSC Staff's Second Request for Information for the rate case for the Sewer Division; reviewed email memo from Emily Childress re missing information	DRT	0.20
09/11/24	Participated in the Teams meeting with client, Emily Childress, and Tina Frederick to review draft answers and Exhibits to the proposed Response to the PSC Staff's Second Request for Information in the rate case for the Sewer Division	DRT	NO CHARGE
09/11/24	Reviewed email memo from Jeff; reviewed revised Excel file re list of debts and Amortization Schedules for the Sewer Division; compared it to the original Excel file	DRT	0.40
09/11/24	Participated in Teams meeting with T. Frederick, D. Talley, and clients to discuss Response to PSC Staff's Second Request for Information	ESC	0.70
09/11/24	Prepared portions of Warren County Sewer Division's Response to PSC Staff's Second Request for Information	ESC	2.10
09/12/24	Finalized initial draft of Sewer Division's Response to Staff's Second Request for Information; compiled Response, attachments, and Exhibits; bookmarked and OCR'd documents to comply with PSC regulations; drafted PSC Transmittal Letter	ESC	3.10
09/12/24	Drafted Response for Item 3 of the Response to PSC Staff's Second Request for Information; created Attachment 2-3a and saved to shared folder	TCF	1.10
09/12/24	Drafted response to Item 4 of PSC Staff's Second Request for Information; prepared Attachment 2-4; saved to shared folder	TCF	1.10
09/12/24	Prepared narrative answers to items 5,11,12, and 13 to PSC Staff's Second Request for Information; prepared email memo to E. Childress re Response to PSC Staff's Second Request for Information	TCF	2.10
09/12/24	Made revisions to the tables included in the Response to Item 13 of the PSC Staff's Second Request for Information for the Sewer Rate Case; identified an error in the Tables of the Response to Item 13 of PSC Staff's Second Request for Information; conferred with E. Childress concerning the needed correction	TCF	5.20
09/13/24	Reviewed the latest version of the Response to the PSC Staff's Second Request for Information for the Sewer Division rate case; made list of suggested edits and corrections	DRT	1.10

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
09/13/24	Reviewed selected proposed Exhibits and Attachments to the Response to the PSC Staff's Second Request for Information to the Sewer Division rate case	DRT	0.80
09/13/24	Reviewed chart contained in the answer to Question 3 of the Response to the PSC Staff's Second request for Information in the Sewer Division rate case; reviewed source information to verify the accuracy of the Long Term Loans; discovered mistake in the Maturity Date of one of the loans; prepared email memo to client re the need to confirm the correct Maturity Date; reviewed reply email memo from client; prepared email memo to Emily Childress and provided her with the correct Maturity Date	DRT	0.70
09/13/24	Exchanged numerous other email memos with client and Emily Childress re the Response to the PSC Staff's Second Request for Information in the Sewer Division rate case	DRT	NO CHARGE
09/13/24	Reviewed PSC website to verify that Response to the PSC Staff's Second Request for Information in the Sewer Division rate case had been uploaded to the correct case file and that Bookmarks work and all Excel files work	DRT	NO CHARGE
09/13/24	Finalized and filed Warren Sewer Division's Response to PSC Staff's Second Request for Information with the Public Service Commission, along with PSC Transmittal Letter and accompanying Exhibits; corresponded with T. Frederick, D. Talley, and client re same	ESC	0.80
09/19/24	Reviewed previous Rate Case Expense Report filed with the PSC; prepared lengthy email memo to Jeff Peeples listing the additional documents and information needed from client to enable SKO to file a monthly Supplemental Rate Case Expense Report for the Sewer Division	DRT	0.20
09/19/24	Prepared portion of First Supplemental Rate Case Expense Report to supplement Warren Sewer's Response to PSC 1-14d	ESC	0.40
09/20/24	Exchanged numerous email memos with client re list of Rate Case Expenses for the Sewer Division and supporting invoices; prepared follow-up email memos to client to obtain additional information	DRT	0.20
09/20/24	Prepared WCWD Sewer Division's Supplemental Response to PSC Staff's First Request for Information, Item No. 14d regarding rate case expense updates	ESC	0.80
09/27/24	Reviewed PSC Staff's Third Request for Information in the rate case for the Sewer Division	DRT	NO CHARGE
09/30/24	Electronically filed September Rate Case Expense Report with Public Service Commission; began preparing Response to PSC Staff's Third Request for Information	ESC	0.90

**Total Services****\$9,500.50****Keep this copy for your records.**

**Summary of Services**

<u>Init</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
DRT	Talley, D R	5.10	405.00	2,065.50
ESC	Childress, Emily	11.60	320.00	3,712.00
TCF	Frederick, Tina	10.20	365.00	3,723.00
	Total Services	26.90		\$9,500.50

TOTAL FEES & DISBURSEMENTS \$9,500.50

**Total Current Charges This Matter \$9,500.50**