

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)**

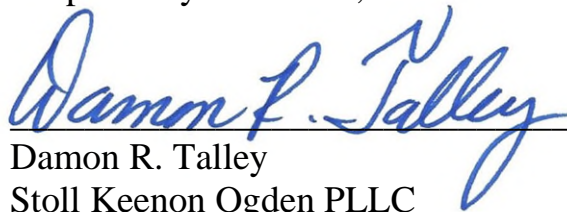
**THIRD SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S
FIRST REQUEST FOR INFORMATION**

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,



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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 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. 2024-00201**

Analysis of Cost of Case No. 2024-00201

As of November 27, 2024

Line No.	Item	Amount
1.	Accounting	\$ 0.00
2.	Engineering	\$ 35,000.00
3.	Legal	\$ 77,097.00
4.	Consultants	\$ 1,125.00
5.	Other Expenses	\$ 5,702.85
6.	Total	\$ 118,924.85

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
1059774	11/04/2024	Stoll Keenon Ogden PLLC	Legal Services	9373	\$ 4,622.00	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					\$118,924.85	

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Hodgenville, Kentucky 42748

(270) 358-3187

Tax ID # 61-0421389

Warren County Water District
jeffp@warrenwater.com

November 4, 2024
Invoice #: 1059774
Account #: 127064/182925

Re: General Rate Adjustment - Sewer Division 2024

Fees rendered this bill	\$ 4,622.00
Total Current Charges This Matter	\$ 4,622.00
Balance as of October 3, 2024	\$9,500.50
Less payments on prior billings	\$0.00
Balance due on prior billings	\$9,500.50
Total Amount Due This Matter	\$14,122.50

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Professional Services for the period through 10/31/24, 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>
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 Sewer Division rate case; prepared memo to file	DRT	NO CHARGE
10/02/24	Participated in Teams meeting with client, D. Talley, and T. Frederick to discuss WCWD's Response to PSC Staff's Third Request for Information	ESC	0.70
10/02/24	Reviewed the PSC Staff's Third Request for Information and the Response filed to the Second Request for Information; read and reviewed information from PSC Staff provided to aid in producing a Response and forwarded the information to E. Childress and D. Talley	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 Sewer 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 Sewer 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 Sewer 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 Sewer Division rate case	DRT	NO CHARGE
10/08/24	Included the narrative answer to Item 7 of the Response to PSC Staff's Third Request for Information concerning the 70/30 split of health and dental insurance costs	TCF	0.20
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 Sewer 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	0.80
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 Sewer Division rate case	DRT	NO CHARGE
10/10/24	Reviewed the draft response prepared by Ross Guffey to Question	DRT	0.50

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	8 of the PSC Staff's Third Request for Information in the Sewer 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		
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 Sewer Division rate case	DRT	NO CHARGE
10/10/24	Participated in Teams meeting with client, D. Talley, and E. Childress to discuss draft Response to Staff's Third Request for Information; prepared portions of Response	ESC	0.40
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 Sewer Division; reviewed narrative response prepared by Ross Guffey; prepared reply email memo to him	DRT	0.30
10/11/24	Reviewed the Excel spreadsheet prepared by client needed to answer Question No. 1 of the PSC Staff's Third Request for Information in the Sewer Division rate case; checked the Principal and Interest payments for each loan contained in the P & I Tab of this Excel spreadsheet with the source documents (Amortization Schedule for each loan to confirm their accuracy; calculated the 3-year average P & I payments and the Debt Service Coverage (Working Capital) amount; prepared email memo to Emily Childress verifying the accuracy of this portion of the Excel spreadsheet	DRT	1.50
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 Sewer Division rate case; compared the existing Water minimum usage volumes Tariff with the existing Sewer minimum usage volumes Tariff for each size meter obtained additional information needed to revise the draft response; prepared three (3) additional paragraphs to the narrative answer to Question No. 8; forwarded revised response to Tina Frederick and Emily Childress	DRT	1.20
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 Sewer 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 in the Sewer Division rate case; prepared email memo to Emily Childress with suggested edits	DRT	0.60
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 Sewer Division rate case to client for his review; received approval from client to file the Response	DRT	0.20

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
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 Sewer Division rate case	DRT	NO CHARGE
10/11/24	Reviewed the Response, Exhibits, and Attachments to the PSC Staff's Third Request for Information in the Sewer Division rate case 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 Sewer 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 the narrative response to Item 5 of the PSC Staff's Third Request for Information and created a Table based on spreadsheet information supplied by J. Peeples; inserted a response provided by J. Peeples into the Response document for Item 3; reviewed R. Guffey's response to Item 8	TCF	1.10
10/11/24	Revised Response to Item 8 of the PSC Staff's Third Request for Information to include D. Talley's suggested introductory paragraphs to the response to Item 8; provided D. Talley with an updated version of the Response	TCF	0.40
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
10/30/24	Reviewed PSC Staff's Fourth Request for Information in the Sewer Division rate case	DRT	NO CHARGE
10/31/24	Reviewed and approved October 31, 2024 Supplemental Rate Case Expense Report in the Sewer Division rate case	DRT	NO CHARGE
10/31/24	Finalized and electronically filed Warren Sewer Division's October Rate Case Expense Report	ESC	0.40
Total Services			\$4,622.00

Summary of Services

<u>Init</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
DRT	Talley, D R	5.40	405.00	2,187.00
ESC	Childress, Emily	5.10	320.00	1,632.00
TCF	Frederick, Tina	2.20	365.00	803.00
Total Services		12.70		\$4,622.00

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TOTAL FEES & DISBURSEMENTS	\$4,622.00
Total Current Charges This Matter	\$4,622.00

Outstanding Invoices

<u>Date</u>	<u>Invoice No.</u>	<u>Billed Amount</u>	<u>Payment/Credits</u>	<u>Balance Due</u>
10/03/24	1057094	\$ 9,500.50	\$ 0.00	\$ 9,500.50
Total Outstanding Invoices This Matter				\$9,500.50
Total Amount Due This Matter				\$14,122.50