



November 26, 2024

Ms. Linda Bridwell
Executive Director
Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

RE: Case No. 2024-00219
Edmonson County Water District
Response to Staff Report Dated November 18, 2024

Dear Ms. Bridwell:

Edmonson County Water District (the "District") submits the following comments concerning the Commission Staff Report:

1. The Monthly Water Rates listed in Appendix B of the Staff Report will not recover the revenue requirement of \$5,060,152. A billing analysis using these rates with test year usage produces \$4,383,692, which is \$676,460 or 13.4% less than the revenue requirement. The District respectfully requests that these rates be reviewed and corrected.
2. Subsequent to receipt of the Staff Report, the District received the attached copies of fiscal court minutes from Edmonson County and Grayson that authorized compensation for Board members. The District respectfully requests that the revenue requirement be revised by \$30,000 to reflect the authorized salaries.
3. The District has implemented a standby duty policy. An on-call employee will be entitled to "stand by pay" in addition to overtime compensation at a rate of \$25.00 per weekday and \$50.00 per weekend day for a total annual cost of \$11,700. Standby pay is a very common means of compensating an employee for holding themselves available for call-out even if their services are not required in a particular period. Employees must sacrifice some degree of freedom to be on-call and deserve to be compensated for this. This expense is known and measurable and should be allowed by the Public Service

This Institution is an Equal Opportunity Provider and Employer
1128 KY Hwy 259 N.
P.O. Box 208
Brownsville, KY 42210
Phone: (270) 597-2165 Fax: (270) 597-2166

Commission. The District respectfully requests that the revenue requirement be revised by \$11,700 to reflect the standby pay.

4. Although the District does not agree with the Staff's removal of certain labor expenses from nonrecurring charges, the District does not wish to contest that adjustment in this case. The District's failure to object to Staff's findings and recommendations concerning the reduction of certain Non-Recurring Charges shall not be construed to be a waiver of the District's right to contest a similar finding or recommendation in a future rate proceeding. The District expressly reserves its right to do so.
5. The District concurs with the remainder of findings presented in the Staff Report.
6. The District waives its right to request an informal conference or hearing in this case.

The District is concerned that these requested corrections may delay the release of the Final Order and respectfully requests that the Public Service Commission contacts our office if any additional information from the District is needed to expedite implementation of the new rates.

Sincerely,



Kevin Shaw
General Manager