

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**RE: ELECTRONIC TARIFF FILING OF THE CITY OF  
AUGUSTA TO INCREASE THE WHOLESALE  
WATER RATE CHARGED TO BRACKEN  
COUNTY WATER DISTRICT**

**INTERVENOR, BRACKEN COUNTY WATER DISTRICT'S (BCWD'S) SET OF  
REQUESTS FOR INFORMATION TO CITY OF AUGUSTA**

**CASE NUMBER 2024-00349**

Comes now the intervening party, Bracken County Water District, ("BCWD") by and through counsel, Mr. Jesse P. Melcher, Esq., and hereby propounds and/or submits to the City of Augusta, a second set of requests for information, pursuant to the KY PSC Order, dated December 27, 2024, as follows:

1. Please provide a copy of the fiscal year 2024 (July 2023 to June 2024) that illustrates total revenues and total expenditures, for the water treatment plant. If said numbers have not been compiled, please state why.

2. The City of Augusta's responses to intervenor, BCWD's, 1<sup>st</sup> requests for information, provided monthly utility bills for three accounts associated with the water treatment plant (answer to question # 10, *see*. *Attachment\_10\_Aug\_Response\_to\_BCWD\_DR1.pdf*), specifically, 1) W. Second Street, Account # 3000-0085-0983; 2) W. Second Street Pump, Acct # 3000-0517-2774; and 3) 203 Ferry Street, Acct # 3000-0640-0174.
  - a) Please identify what each electric account runs electric for and/or to and what is operated by each account?
  - b) Please identify what the multiplier number means for each account.
  - c) Please state which account # of the monthly KU Bills provided represents any electric used by the waste water treatment plant.
  
3. The City of Augusta's responses to intervenor, BCWD's, 1<sup>st</sup> requests for information, (answer to question # 10, provided copies of meter tests in 2021 and 2023. *see*. *Attachment 10\_Aug\_Response\_to BCWD\_DR1.pdf*. Specifically, the invoice for the test in 2023 (Invoice S100238639.001, dated 11/29/2023), shows 2 Citco Field Meter Test Service. Please explain which meters and or meter was/were tested? If only the main master meter to Bracken was serviced, why were there two service charges?
  
4. The City of Augusta's responses to intervenor, BCWD's, 1<sup>st</sup> requests for information, (answer to question # 8), (*see*. *8\_Aug\_Response\_to\_BCWD\_DR1.pdf*); the chart shows overtime for employee # 1 of 270.75 hours, overtime for employee # 2 of 303.75 hours, and overtime for employee # 3 of 176.75 hours. Please identify the dates and times for each day of overtime work and the work performed for those days and hours of overtime work.
  
5. Does the City of Augusta anticipate a total of 756 hours more or less, as normalized annual overtime for all of its employees, as a routine and regular expense?

6. The City of Augusta's responses to intervenor, BCWD's, 1<sup>st</sup> requests for information, (answer to question # 8), (see. 8\_Aug\_Response\_to\_BCWD\_DR1.pdf); show hourly rates for each employee for the test period/test year; however, an adjustment of \$10,070 is requested to adjust to current wages. Please state each employee of the water treatment plant's current wage rate or salary rate, and their expected amount of normal work hours.
  
7. For all employees who have a higher wage rate than as illustrated in the referenced response to question # 6, and question no. 8 in first set of questions, (see. 8\_Aug\_Response\_to\_BCWD\_DR1.pdf); please identify the date and time the City Council approved the raise and reference the applicable minutes (if already provided) or provide the minutes if not in the previously provided minutes.
  
8. The water rate study on page 2, last paragraph states, "While the 2016 contract does not include a provision that specifically allows for known and measurable adjustments to revenues, there is no prohibition against such adjustments." Please state where in the 2016 contract (and/or amendments) that revenues of either party are a part of the agreed calculation for adjusted wholesale water rate.
  
9. Please admit the 2016 contract (and/or its amendments) makes no provision for changes and/or adjustments to the amount of test period/test year sales to either party. If Augusta denies this assertion, please state its reasoning that changes can be made to the amount of test period/test year sales to either party for the purposes of calculating the adjusted wholesale water rate.

Respectfully submitted,

/s/ JESSE P. MELCHER, ESQ.  
BRACKEN COUNTY WATER DISTRICT,  
ATTORNEY  
JESSE MELCHER LAW OFFICE, PLLC  
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#### CERTIFICATE OF SERVICE

I, Jesse P. Melcher, Esq. as counsel and representative of BCWD herein, do hereby certify that I have mailed out by electronic filing through the KY PSC web portal, pursuant to 807 KAR 5:001(8), this the 23<sup>th</sup> day of January, 2025; and that no party herein, has opted out of the electronic notice and/or filing herein, and proof of electronic filing and courtesy copy are as follows:

KY PSC, filed by web portal in this case number

Ms. Cynthia Thompson, Esq.  
Counsel for City of Augusta  
ccthompsonatty@yahoo.com

Courtesy Copy by mail, U.S.P.S.  
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/s/ MR. JESSE P. MELCHER, ESQ.