

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ALTERNATIVE RATE ADJUSTMENT FILING OF)	CASE NO.
CUMBERLAND COUNTY WATER DISTRICT)	2025-00226
)	

AMENDED RESPONSE OF CUMBERLAND COUNTY WATER DISTRICT
TO THE COMMISSION STAFF'S SECOND REQUEST FOR
INFORMATION DATED SEPTEMBER 9, 2025 QUESTION 2b

**Cumberland County Water District
Case No. 2025-00226
Commission Staff's Second Request for Information
Amended Response to Question #2b**

Witness: Michael Ballard

2. Refer to Cumberland District's response to Staff's First Request, Item 8a, Gallons Purchased and Cost, and Item 8b, Water Purchased Reconciliation.
 - b. Explain why the cost does not match the wholesale rates listed in the tariff on file with the Kentucky Public Service Commission for Burkesville, Albany, and Columbia – Adair Utilities District.

Response: Using data from Item 8b Water Purchased Reconciliation, the computed cost per thousand gallons does not match the wholesale rates because the invoiced dollar amounts were based upon the meter reading cycle and the reported gallons were based upon the calendar month.

See files 2024_Water_Invoices
 8b_Water_Purchased_Reconciliation
 (with new tab 2024_Invoices added)

When reviewing the file 8b_Water_Purchased_Reconciliation tab 2024_Invoices, it appears that the imputed rates charged for invoices from City of Burkesville and from Columbia – Adair Utilities District were at their approved tariff rates.

However, the imputed rates charged for invoices from City of Albany were different from the tariff rate on file with Kentucky Public Service Commission. In recent conversations with Sydney Hunter, Albany Municipal Water Works Manager, the rates charged to Cumberland District were:

First 1,500,000 gallons	\$3,020.47 per month
Over 1,500,000 gallons	\$ 2.92 per thousand gallons

It appears that City of Albany increased its wholesale rate since 2009 without submitting an updated tariff sheet to Kentucky Public Service Commission.

See file City of Albany Billing System Wholesale Rates