

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF MONTGOMERY COUNTY	)	CASE NO.
WATER DISTRICT NO. 1 FOR RATE	)	2009-00343
ADJUSTMENT PURSUANT TO 807 KAR 5:076	)	

COMMISSION STAFF'S SECOND INFORMATION REQUEST  
TO MONTGOMERY COUNTY WATER DISTRICT NO. 1

Montgomery County Water District No. 1 ("Montgomery District"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due within 15 days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Montgomery District shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or,

though correct when made, is now incorrect in any material respect. For any request to which Montgomery District fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to Montgomery District’s response to the Commission Staff’s First Information Request, item 5. For each item listed in Table 1 below, provide a complete and detailed description of the service provided and a copy of all supporting invoices.

Table 1: Invoices					
	<u>Account Title</u>	<u>Date Paid</u>	<u>Check #</u>	<u>Vendor</u>	<u>Amount</u>
a.	Contract Labor	01/15/2008	2485	Keath Construction	2,280.00
b.	Contract Labor	05/13/2008	2597	Keath Construction	3,178.00
c.	Contract Labor	08/01/2008	2685	Keath Construction	3,600.00
d.	Contract Labor	10/01/2008	2736	Keath Construction	690.00
e.	Contract Labor	10/10/2008	2750	Stacy Hiler	124.00
f.	Contract Labor	12/09/2008	2820	Keath Construction	2,130.00
g.	Lab Expense	08/15/2008	2700	Microbac Laboratories	1,165.20
h.	Supplies - Other	03/14/2008	2535	Water Works Supplies Inc.	5,940.00
i.	Supplies - Other	07/09/2008	2659	Consolidated Pipe & Supply Co.	1,619.73
j.	Tank Maintenance	10/16/2008	2760	Utility Services	7,793.50

2. Refer to Montgomery District’s response to the Commission Staff’s First Information Request, item 8.

a. Provide the total number of hours the part-time office clerk worked during the calendar year 2009.

b. Explain why the office manager is the only employee who receives insurance benefits.

c. Generally, retirement benefits are not offered to part-time employees. Explain why Montgomery District gives its part-time office clerk a retirement benefit.

3. Refer to Montgomery District's response to the Commission Staff's First Information Request, item 11.

a. Montgomery District provided the workers compensation invoice for the policy period of July 1, 2008 through July 1, 2009. Provide a copy of the workers compensation invoice for the policy period of July 1, 2009 through July 1, 2010.

b. Provide a copy of the general liability invoice that was paid in 2008 and the invoice for the current general liability policy period.

4. Refer to Montgomery District's response to the Commission Staff's First Information Request, item 12.


a. Montgomery District provided in Exhibit 7 two Kentucky Utilities invoices for the service period of March 17, 2009 through August 17, 2009. The first invoice has a total charge for the six-month period of \$1,009 and the second invoice has a total charge of \$982. Identify the correct amount that was billed and paid for electric service that was provided to Montgomery District for this period. Include an explanation as to why Montgomery District did not receive a separate bill for each month during this period.

b. Provide a copy of the Kentucky Utilities invoice for account number 3000-0668-9687 and service address Lake Road Pump for the service period ending in December 2009.

5. Refer to Montgomery District's response to the Commission Staff's First Information Request, item 14.

a. Identify how often Montgomery District is required to perform the stage 2 H5 and THM test in a year. Include any form of documentation to support Montgomery District's response.

b. Confirm if Montgomery District performed the stage 2 H5 and THM test three times in calendar year 2009.<sup>1</sup>



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Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED: FEB 12 2010

cc: Parties of Record

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<sup>1</sup> There are three invoices provided with test dates of January 1, 2009, April 2, 2009, and October 1, 2009.

Uriah Holley, Jr.  
Montgomery County Water District #1  
4406 Camargo Road  
Mt. Sterling, KY 40353