

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

APR 05 2010

**PUBLIC SERVICE
COMMISSION**

In the Matter of:

The Proposed Adjustment of)
Wholesale Service Rates of the) Case No. 2009-
Hopkinsville Water Environment Authority) 00373

CHRISTIAN COUNTY WATER DISTRICT'S

DATA REQUESTS TO HWEA

Christian County Water District, by counsel, submits the following questions to the HWEA pursuant to the Commission's order of March 24, 2010.

1. a. What is the maximum capacity of HWEA's water treatment plant?
 - b. Is any portion of the plant's treatment capacity reserved for any customer?
 - c. Describe the changes, if any, that HWEA expects within the next 3 years in the level of water treatment capacity reserved for each of the customers listed in (b) above and state the reason(s) for HWEA's expectations.
2. a. Who owns the master meter(s) through which HWEA provides water to Christian County Water District (CCWD)?

- b. Who is responsible for maintaining these master meters?
3. What portion, if any, of HWEA's water main(s) that serve the CCWD are gravity fed?
4. Does HWEA provide unmetered water service to any entities (e.g., service to municipal buildings, fire departments or protection services).
 - a. If unmetered service is provided, then for each type of service, estimate the percentage of the total unmetered amount.
 - b. On schedule B, Table B-1 of the Cost of Service Study (COS), does total unaccounted water include Flushing/Hydrants and plant use?
 - c. In Table B-2, explain the "Modified Meet 15% Lost Water" calculations.
5. How were the maximum day and maximum hour demand factors used in the COS determined for the retail and wholesale customers?
 - a. If estimated, explain the method and assumptions used.
6. On page 1-1 of the COS, it is stated that demand for the last three years has exceeded 80% of design capacity of the MWTP 858 times. For 2009, provide the percentage demand by customer class for the days that demand exceeded 80% of design capacity at MWTP.
7. Will CCWD's contractual 2.0 mgd increase as a result of the installation of the new raw water main or improvements to the Moss WTP?
8. Provide CCWD's annual purchases from 2005 through 2009.

9. Provide any projections, studies, reports or other information prepared by or in the possession of HWEA about the future water needs of CCWD.
10. On page 1-1 of the Cost of Service Study (COS) there is a reference to rising demand for water in Christian County. Provide any studies, reports or other information supporting the rising demand.
 - a. Provide the demand for each customer class for the last five years.
 - b. Provide the average and maximum day usage for each customer class for the last five years.
11. Provide the analysis of the current retail rate structure referenced on page 1-1 of the COS.
12. Explain why distribution mains eight inches and smaller are allocated to CCWD as reflected in Table B-5 of the COS.
13. On Schedule C of the COS, Transmission and Distribution provide a breakdown of the "Repairs to Distribution Mains" , Repairs to Services, Repairs to meters, Removing and re-setting meters, Repairs to Fire Hydrants, and "Misc. Expense."
 - a. Explain why each of these expenses should be allocated to CCWD.
14. On Schedule C of the COS, provide a breakdown of the Transportation Expense and Water Technical Services – Miscellaneous Expense.

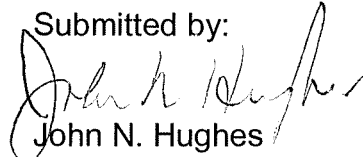
15. On Schedule C of the COS - Water Administrative and General, provide an explanation of each expense and why each of those expenses should be allocated to CCWD?
16. On Schedule C-3 of the COS, explain why the expenses for accounts 7010, 7020, 7080, 7090, 7110, 7140 are included in the allocation factor calculation for CCWD.
17. On Schedule C-3 of the COS, explain why the total expenses for Meter Reading salaries are included in the allocation factor calculation for CCWD.
18. On Schedule C-3 of the COS explain the inclusion of the Pembroke – Distribution Labor; Administrative Labor and the Crofton Distribution Labor and Administrative Labor in the allocation factor calculation for CCWD.
19. On page 3 Exhibit 4, it is stated that the HWEA's operating revenues increased 8.38% and operating expenses increased 4.47% in 2009. Do these figures include the 37% retail rate increase for 2009?
20. On page 7 of Exhibit 4, it is stated that the rate increase will be used to expand the Moss WTP and to consolidate sewage treatment at Hammond Wood facility. Is the 37% retail rate increase to the HWEA customers a water rate increase only or a water and sewer rate increase?
 - a. If a water and sewer rate increase, provide a breakdown of the portion of the increase that is applicable to sewer.
21. What is the rate that HWEA is proposing to charge CCWD?

22. Provide a revised Table 4-1 of the COS showing the effect of the 37% increase in retail rates effective in 2009.
23. See Exhibit D to the COS. Provide any study, report or other information that supports the 50 year life for Distribution Mains.
24. See Exhibit D to the COS. Explain why Services, Meter & Installation, Hydrants, and distribution mains 8 inches and smaller are included in the Depreciation allocation to CCWD.
25. In the attachment to the testimony of Russell King, a depreciation schedule includes Sewer Mains and Laterals. Are any of those expenses included in the wholesale water rate calculation or allocations?
26. What was the daily pumping capacity of the city's raw water supply prior to the completion of the Lake Barkley Intake and Raw Water Main Projects?
27. What is the daily pumping capacity of the city's raw water supply after the completion of the Lake Barkley Intake and Raw Water Main Projects?
28. What is the current rated treatment capacity of the Moss WTP?
 - a. What is the expected rated capacity of the Moss WTP after completion of improvements?
29. Provide any studies, reports, analyses or other information about the city's retail customer growth and water demand for the next five years.
 - a. Provide any studies, reports, analyses or other information about the city's retail customer growth and water demand that were used to

support the need for the Lake Barkley Intake and Raw Water Main Project and improvements to the Moss WTP.

30. Are any revenues and expenses allocated among the Water and Sewer Divisions? If yes, explain how the revenues and expenses are allocated.

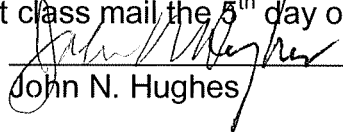
Submitted by:



John N. Hughes
124 West Todd St.
Frankfort, KY 40601
Attorney for CCWD

Certificate:

I certify that a copy of this data request was served on Damon Talley, 112 N. Lincoln Blvd. Box 150 Hodgenville, KY 42748 by first class mail the 5th day of April, 2010.


John N. Hughes