

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PROPOSED ADJUSTMENT OF WHOLESALE)	CASE NO.
WATER SERVICE RATES OF THE CITY OF)	2009-00428
GREENSBURG)	

SECOND DATA REQUEST OF COMMISSION STAFF
TO THE CITY OF GREENSBURG

The City of Greensburg ("Greensburg"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due on or before April 21, 2010. 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.

Greensburg 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 Greensburg 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. Several of the operating expenses have Revolving Fund entries. What is this fund for and what types of expenses are included in it?

2. Provide an explanation as to what is included in the following expenses and why they are being allocated to the wholesale customer:

a.	Advertising	\$990.47
b.	Bank Service	\$1,131.36
c.	Dues and Subscriptions	\$115.83
d.	Extinguishment Loss	\$4,094.00
e.	Fees	\$4,508.93
f.	Other – Various	\$2,668.14
	(1) Including \$462.50 for NSF	
g.	Rent	\$9,000.00
h.	Training and Travel	\$4,982.72
i.	Website Hosting Fee	\$77.39

3. Provide invoices and the calculations for determining the Known Adjustments of \$43,706.00 shown on Table 1 of the Cost of Service Study.

4. What services are provided by the following companies:

- a. Bertram, Cox, & Miller;
- b. Mattingly Mediation, Inc.;
- c. H & R Jetting & Camera;
- d. Hunt Tractor;
- e. KLCIS;
- f. Central Farmers Supply; and
- g. Tommie Mills.

5. Refer to the breakdown of 2008/2009 wages and salaries table in Appendix A of the rate study. Provide the job duties of the Laborers and what duties are allocated to the wholesale customer.

6. Refer to the breakdown of 2008/2009 wages and salaries table in Appendix A of the rate study. Provide the job duties of the City Clerk, Deputy City Clerk and Water and Sewer Clerk, and provide what job duties each performs that are allocated to the wholesale customer, specifically for the Intake/Raw Water and Treatment, Transmission and Distribution, and Meter Reading/Repair Billing categories.

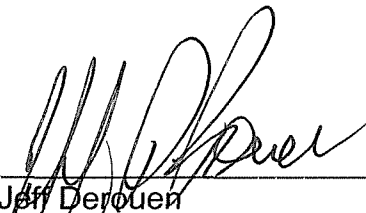
7. Refer to the allocation of vehicles and equipment table in Appendix A of the rate study. Explain how many of these vehicles and pieces of equipment have been allocated to the wholesale customer. Provide all workpapers or schedules used to determine this allocation.

8. In Table 5 of the rate study, which is the Tabulation of Lines in System and Used Jointly, you state on page 8 that the tabulations of line lengths and sizes were

based upon mapping provided by Kentucky Infrastructure Authority and the Council of Area Development Districts. Was a hydraulic study completed to determine what mains were utilized in relation to the wholesale customer? If a study was performed, provide the study and all workpapers or schedules used to determine this information.

9. The Commission has previously disallowed small mains to be classified as transmission mains in wholesale rate cases. Explain why the Commission should consider allowing the smaller mains listed in Table 5 to be included in your calculation of the wholesale rate.

10. What is the smallest line size used to serve the wholesale customer?



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DATED APR - 6 2010

cc: Parties of Record

Case No. 2009-00428

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