

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF MARTIN COUNTY)	
WATER DISTRICT FOR ALTERNATIVE)	CASE NO.
RATE ADJUSTMENT)	2018-00017

COMMISSION STAFF'S FIRST REQUEST
FOR INFORMATION TO MARTIN COUNTY WATER DISTRICT

Martin County Water District (Martin District), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on or before July 17, 2018. 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.

Martin 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 Martin 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 filing a paper containing personal information, Martin District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Martin District's Motion for Leave to Pay Vital Creditors from the Surcharge Account (Motion for Leave), Exhibit 1, Aged Payables as of June 25, 2018.

a. Provide copies of the original invoices for each item that is listed on this schedule. For each invoice that totals over \$500, if the invoice does not provide a detailed summary of the service or products provided, provide a separate detailed summary that shows the invoice date, date of service, exact service or product provided, and invoice amount so that it may be tied directly to the Aged Payables in Martin District's Motion for Leave.

b. State whether Martin District intends to use the surcharge funds to retire its oldest debt to C.I. Thornburg and Evans Hardware (vendors) first. If it cannot affirmatively state this, provide a detailed explanation why it would not retire its oldest debts first.

c. For the invoices listed on the schedule that are 30 days old or less, state whether Martin District intends to pay these invoices using funds from Martin

District's operating account, or if it intends to continue to accrue accounts payable to these vendors.

(1) If Martin District's intention is to pay invoices using funds from its operating account, state the date that it will pay these invoices and the exact amount that will be paid on each invoice.

(2) If Martin District's intention is to accrue additional accounts payable to these vendors, provide a detailed statement as to why these amounts cannot be paid from the operating account before they become past due.

2. Provide the exact terms of the financial agreement with these vendors that includes the timeframe for when an invoice becomes past due after it is generated. If a physical copy of the agreement exists, provide the agreement. Provide the amount of penalty, if any, that these vendors charge for any invoice that becomes past due.

a. Provide a list of any accounts that are not listed in this Motion for Leave that are currently past due that charge interest or penalties for non-payment and the amount being charged for each. For any account on this list for which the interest or penalty is higher than any penalty charged by the vendors in this Motion for Leave, if any, state the reason why these accounts would not be paid out of the surcharge account first.

3. State whether Martin District is keeping current with all of its accounts payable (30 days or less) with respect to its present operations. If this cannot be stated in the affirmative, provide a detailed explanation as to why Martin District cannot stay current with its present operations with the funds available in its operating account.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED **JUL 06 2018**

cc: Parties of Record

Case No. 2018-00017

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