

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
MUHLENBERG COUNTY WATER DISTRICT #3)	CASE NO.
REQUESTING DEVIATION FROM)	2018-00159
REQUIREMENTS OF 807 KAR 5:066, SECTION)	
4(4))	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
MUHLENBERG COUNTY WATER DISTRICT #3

Muhlenberg County Water District #3. ("Muhlenberg District"), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due July 1, 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 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.

Muhlenberg District shall make timely amendments 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 Muhlenberg 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 should 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 document containing personal information, Muhlenberg 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 page 4, paragraph 13 of Muhlenberg District's Application which states that on August 29, 2017, it filed a post-case letter in Case No. 2016-000421¹ stating that it had been "unable to obtain a written agreement with Central City as MCWD3 was currently protesting Central City's rate increase in Case No. 2017-00199 and it had been unable to discuss the terms of such an agreement with Central City."².

a. Provide all correspondence between the parties concerning the water storage written agreement since the conclusion of the 2017-00199³ case.

b. Provide the date, time, location, and list of attendees of any meetings in which discussions between the parties concerning the water storage written agreement, occurred since the conclusion of the 2017-00199 case.

¹ *Electronic Application of Muhlenberg County Water District #3 Requesting Deviation from Requirements of 807 KAR 5:066, Section 4(4)* (Ky. PSC Dec. 2, 2016).

² Application at 4.

³ *Proposed Adjustment of the Wholesale Water Service Rates of Central City Municipal Water and Sewer* (Ky. PSC Apr. 13, 2017).

2. Refer to Case No. 2016-00421, and the Commission's Order of May 31, 2017. Muhlenberg District was ordered to file with the Commission an agreement regarding water storage "no later than 90 days from the date of this Order . . . that addresses, at a minimum, the amount of the allocation, duration of the agreement, including any renewal periods, and rights and obligations of the parties concerning the allocation including during an emergency."⁴

3. Refer to Case No. 2017-00199 and the Commission's Order dated September 12, 2017, which grants Central City's motion to withdraw its proposed wholesale rate increase.⁵

a. Confirm that Muhlenberg District has not filed a written agreement regarding water storage with Central City since the withdrawal of its requested wholesale rate increase.

b. Explain why Muhlenberg District has not complied with the Commission's May 31, 2017 Order requiring the filing of a water storage agreement with Central City.

4. Refer to page 4, paragraph 14 of Muhlenberg District's Application. Muhlenberg District states that it believes Central City will file another rate case within six months and that it believes Muhlenberg District will be able to file a water storage agreement with the Commission at the conclusion of such a rate case.

⁴ *Electronic Application of Muhlenberg County Water District #3 Requesting Deviation from Requirements of 807 KAR 5:066, Section 4(4)* (Ky. PSC Dec. 2, 2016).

⁵ *Proposed Adjustment of the Wholesale Water Service Rates of Central City Municipal Water and Sewer* (Ky. PSC Apr. 13, 2017).

a. Explain what is preventing Muhlenberg District from reaching a water storage agreement with Central City currently, rather than waiting for the possibility that Central City will file a water storage agreement in a rate case in the future.

For 
Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED JUN 14 2018

cc: Parties of Record

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