

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
SOUTHERN WATER AND SEWER)	CASE NO.
DISTRICT FOR AN ALTERNATIVE RATE)	2018-00230
ADJUSTMENT)	

COMMISSION STAFF'S POST-HEARING REQUEST
FOR INFORMATION TO SOUTHERN WATER AND SEWER DISTRICT

Southern Water and Sewer District (Southern District), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information, with a copy to all parties of record. The information requested herein is due on or before Tuesday, January 15, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. 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.

Southern District shall make timely amendment to any prior response if they obtain information that 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 Southern District fails or refuses to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their failure to respond completely and precisely.

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, Southern 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. Provide a description and the associated value of all water service assets owned by the Floyd County government that Southern District utilizes to provide water to its customers.

2. Provide the total number of Southern District customers that were previously unmetered in the area now being served by Prestonsburg City's Utilities Commission (PCUC).

3. Provide the date and all related documentation associated with the last time Southern District prosecuted a customer for theft of water service.

4. Provide the Floyd County Fiscal Court meeting minutes for October, November, and December 2018.

5. Provide the resignation letter, if any, that Hayes Hamilton sent to the Floyd County Fiscal Court and any corresponding documentation from the fiscal court that accepted his resignation.

6. Provide copies of the executed wholesale water service contracts for PCUC, the city of Pikeville, the Knott County Water District, and the city of Hindman.

7. Provide all minutes of the Southern District Board of Commissioners meetings from January 2013 to the date of the issuance of this request.

a. Provide confirmation that Southern District currently follows the Kentucky Open Records Act, KRS 61.870 to KRS 61.884.

b. Provide confirmation that Southern District currently follows the Kentucky Open Meetings Act, KRS 61.800 to KRS 61.850.

8. Provide a detailed list identifying all compensation and all other payments made by Southern District that include, but are not limited to, wages, bonuses, gift cards, travel and entertainment, transportation expense reimbursements, etc., to each of its employees for the years 2016, 2017, and 2018. For each item listed, provide a detailed description of the purpose of the compensation or payment.

9. Confirm that Southern District does not have any contract personnel.

10. Provide the names of any and all third-parties which Southern District has hired or entered into a contract with to perform services having a value of \$20,000 or less from January 2013 to the date of the issuance of this request.

11. Provide a list of Southern District's monthly customer disconnections by account number or customer name, for the fourth quarter of 2018.

12. Provide the names of meter reader employees terminated by Southern District for not reading meters from January 2013 to the date of the issuance of this request.

13. Provide the fourth quarter of 2018 system flushing usage, by month, as calculated by the formula cited during the January 8, 2019 hearing by witness Dean Hall. Include the formula relied upon, identifying all variables, and all assumptions and work papers utilized to produce this information.

14. Provide the fourth quarter of the 2018 fire protection water usage, by month, as calculated by the formula cited during the January 8, 2019 hearing by witness Dean Hall. Include the formula relied upon, identifying all variables, and all assumptions and workpapers utilized to produce this information.

15. Provide the applicable statute, as testified to at the January 8, 2019 hearing, which sets the amount of fire protection water usage as a percentage of water sales in the absence of reporting by the fire department.

16. Provide the make, model, and year of each vehicle that is currently personally assigned to an employee of Southern District.

a. Confirm that each employee that has a vehicle personally assigned to them has been paying taxes on that vehicle for any personal miles driven.

b. Confirm that each employee that has a vehicle personally assigned to them reports any personal miles driven on that vehicle to their supervisor.

17. Provide a copy of every letter, email, or other document, including but not limited to contracts or agreements, between Southern District, PCUC or all attorneys for

legal services rendered or to be rendered in connection with the negotiation, sale and transfer of water distribution assets and sewer assets from Southern District to PCUC.

18. Provide evidence of all payments made by Southern District for legal services in any way related to the transactions referred to in Item 17 above, as well as evidence of all payments to Terry Fyffe CPA, ABV for appraisal services rendered in connection therewith.

19. Confirm that Southern District has adopted the Kentucky Model Procurement Code.

a. If confirmed, provide a copy of the minutes of the Southern District Board of Commissioners meeting when it was adopted.

20. Provide a copy of Southern District's Governance and Policy Manual.


Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JAN 10 2019

cc: Parties of Record

*Clay A. Barkley
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KENTUCKY 40202

*Ned Pillersdorf
Pillersdorf, DeRossett & Lane
124 West Court St.
Prestonsburg, KENTUCKY 41653

*Southern Water & Sewer District
245 Kentucky Route 680
P. O. Box 610
McDowell, KY 41647

*Rebecca W Goodman
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Dean Hall
Operations Manager
Southern Water & Sewer District
P.O. Box 610, 245 Kentucky Route 680
McDowell, KENTUCKY 41647

*Randal A. Strobo
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KENTUCKY 40202

*Holly Nicholas
Kentucky Eng Group PLLC
P.O. Box 1034
Versailles, KENTUCKY 40383

*Justin M. McNeil
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Kent Chandler
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204