

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO THE)	
OPERATION AND MANAGEMENT OF WESTERN)	CASE NO.
LEWIS-RECTORVILLE WATER AND GAS)	2019-00028
DISTRICT PURSUANT TO KRS 74 AND KRS 278)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO WESTERN LEWIS-RECTORVILLE WATER AND GAS DISTRICT

Western Lewis-Rectorville Water and Gas District (Western Lewis-Rectorville 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. The information requested is due within ten days of the date of this request. 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, with copies to all parties of record and the original in paper medium and an electronic version filed with the Commission. 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.

Western Lewis-Rectorville 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 Western Lewis-Rectorville 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, Western Lewis-Rectorville 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 any contracts executed by Chad Clark and Western Lewis-Rectorville District between January 13, 2015, and the date of this request that pertain to Mr. Clark's employment with Western Lewis-Rectorville District.

2. Provide copies of board minutes between February 1, 2015, and the date of this request that pertain to Mr. Clark's employment with Western Lewis-Rectorville District.

3. Refer to the response to the January 23, 2019 Order, General Manager Salary, which states that Mr. Clark's approved salary was \$1,000 per week when he was hired in 2015 and his approved salary was \$1,040 per week in 2017. Also, refer to

the response to Commission Staff's Second Request for Information, Item 4, which states that Mr. Clark's salary was increased to \$1,100 per week in 2018. Also, refer to the response to Staff's Second Request, Item 1, Attachment 1, the board minutes for January 13, 2015, that state that the board approved a weekly salary of \$1,150 for Mr. Clark. Finally, refer to the response to Staff's Second Request, Item 2, Attachment 2, which purports to be Mr. Clark's time record and reflects that Mr. Clark received \$1,000 per week in September, October, November, and December 2018, and \$1,150 per week in January 2019.

a. Identify the person or persons who prepared Mr. Clark's time records filed as Attachment 2 to the response to Staff's Second Request, Item 2.

b. Provide Mr. Clark's weekly salary amount that was approved for and actually paid in 2015, 2016, 2017, 2018, and 2019. If there is a discrepancy in the amount approved and paid, explain the discrepancy in specific detail.

c. Explain in specific detail why Western Lewis-Rectorville District provided salary amounts for Chad Clark that are inconsistent and contradictory.

d. Explain in specific detail why Western Lewis-Rectorville District provided salary amounts for Chad Clark that conflict with time records referenced in Item 1.a. above.

4. Refer to the response to Staff's Second Request, Item 4, which states that Mr. Clark began to keep track of his time in 2018. Provide copies of Mr. Clark's time records beginning with his first time record in 2018 through August 2018.

5. Refer to the response to Staff's Second Request, Item 5, regarding Mr. Clark's contracted employment with two other utilities, which states, "Mr. Clark averages 8 and 10 hours, respectively, per month at each operation."

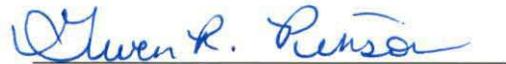
a. Confirm that Mr. Clark is paid \$1,750 per month by Buffalo Trail Water Association for working an average of eight hours per month. If this cannot be confirmed, provide the monthly rate and average number of hours worked per month.

b. Confirm that Mr. Clark is paid \$2,100 per month by Western Mason Sanitation District for working an average of ten hours per month. If this cannot be confirmed, provide the monthly rate and average number of hours worked per month.

6. Refer to Staff's Second Request, Item 9, which requested a copy of *Allocations of Profit and Loss* in paper format and in Excel spreadsheet format, with formulas intact and unprotected, and all tabs, rows, and columns fully accessible in the Excel spreadsheet format. Also, refer to the response to Staff's Second Request, Item 9, which included only the paper format of the spreadsheet titled *Allocation*. Provide *Allocations of Profit and Loss* which includes the spreadsheets titled *Allocation*, *P&L Grouping*, *Deprec. Water*, and *Water Taps Capitalized*, in Excel spreadsheet format, with formulas intact and unprotected, and all tabs, rows, and columns fully accessible in the Excel spreadsheet format.

7. Refer to the response to the Request for Information issued as an Appendix to the January 23, 2019 Order, Item 7, and to the response to Staff's Second Request, Item 13. In Staff Reports issued in Case Nos. 2017-00074 and 2014-00266, Western Lewis-Rectorville District was directed to allocate shared costs attributed to both the water and gas divisions using a customer percentage allocation factor. Explain

why Western Lewis-Rectorville allocated costs that were attributable to a discrete division, such as chemicals used to treat water, using a customer percentage allocation methodology that applies only to shared costs.



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

DATED: APR 09 2019

cc: Parties of Record

*Western Lewis-Rectorville Water and Gas District
8044 KY 3161
Maysville, KY 41056-9344

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Maysville, KY 41056-9344

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Maysville, KY 41056-9344