

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PROPOSED ADJUSTMENT OF)	
THE WHOLESALE WATER SERVICE RATES OF)	CASE NO.
THE CITY OF PIKEVILLE TO MOUNTAIN WATER)	2019-00080
DISTRICT)	

COMMISSION STAFF'S SECOND REQUEST FOR
INFORMATION TO MOUNTAIN WATER DISTRICT

Mountain Water District (Mountain 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 on or before August 13, 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 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.

Mountain District shall make timely amendment to any prior response if it obtains 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 Mountain 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 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. When filing a paper containing personal information, Mountain 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 the following information concerning the costs for the preparation of this case:

a. A detailed schedule of expenses incurred to date for the following categories:

- (1) Accounting;
- (2) Engineering;
- (3) Legal;
- (4) Consultants; and
- (5) Other Expenses (Identify separately).
- (6) For each category, the schedule should include the date of

each transaction, check number or other document references, the vendor, the hours

worked, the rates per hour, amount, a description of the services performed, and the account number in which the expenditure was recorded. Provide copies of contracts or other documentation that support charges incurred in the preparation of this case. Identify any costs incurred for this case that occurred during the base period.

b. An itemized estimate of the total cost to be incurred for this case. Expenses should be broken down into the same categories as identified in “a.” above, with an estimate of the hours to be worked and the rates per hour. Include a detailed explanation of how the estimate was determined, along with all supporting workpapers and calculations.

c. Provide monthly updates of the actual costs incurred in conjunction with this rate case, reported in the manner requested in (a) above.

2. Refer to the Testimony of Connie Lea Allen, P.E. (Allen Testimony), pages 10–11, Item 20.

a. Confirm that in the cost-of-service study (COSS), the analysis used a volume for Mountain Water District (Mountain District) of 456,591,000 gallons instead of the 463,000,000 as reported by the city of Pikeville (Pikeville).

b. Also, confirm that the analysis was limited to the use of the 456,591,000 gallons for Mountain District, no matter the response from Pikeville.

3. Refer to the Allen Testimony, pages 16–17, Item 29.

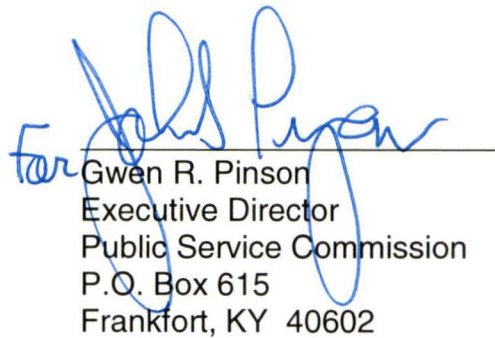
a. Confirm that the miles of line are from the Kentucky Water Resource Inventory System (WRIS) and Pikeville.

b. Provide all workpapers, assumptions, and analyses on the inch mile information for the stated calculation of 40 percent using the footage from the WRIS and

the American Water Works Association system theory. Provide this calculation and supporting information in Excel spreadsheet format with all rows and columns unprotected and accessible.

4. Refer to the Mountain District's First Request, Item 29, and the Commission's Order in Case No. 2002-00022.¹ Listed in Table II of the Order are miles of main that are jointly used by Mountain District and Pikeville.

- a. Provide this information for the instant case.
- b. If these miles of main are no longer in use by both Mountain District and Pikeville as jointly used lines, explain why.


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

DATED JUL 26 2019

cc: Parties of Record

¹ Case No. 2002-00022, *Proposed Adjustment of the Wholesale Water Service Rates of the city of Pikeville, Kentucky*, (Ky. PSC Oct. 18, 2002).

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