

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PROPOSED ADJUSTMENT OF)	CASE NO.
THE WHOLESALE WATER SERVICE RATES OF)	2019-00444
PRINCETON WATER AND WASTEWATER)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO INTERVENORS

Caldwell County Water District (Caldwell District) and Lyon County Water District (Lyon District), pursuant to 807 KAR 5:001, are to file jointly with the Commission the original and an electronic version of the following information. The information requested is due on or before April 17, 2020. Pursuant to the Commission's Order in Case No. 2020-00085¹ issued March 16, 2020, Caldwell District and Lyon District WILL NOT FILE the original paper copy of all requested information at this time, but rather will file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium 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,

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID19* (Ky. PSC March 16, 2020).

and belief formed after a reasonable inquiry.

Caldwell District and Lyon 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 Caldwell District and Lyon District fail or refuses to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for the 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, Caldwell District and Lyon 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 the Direct Testimony of Alan Vilines (Vilines Testimony), page 4, lines 4–6.

a. Explain why Customer or Administrative costs should be allocated to the Wholesale customer.

b. If Customer or Administrative costs are allocated to the wholesale customer, explain whether or not it would be appropriate to account for these costs as a customer charge.

2. Refer to the Vilines Testimony, page 6, line 15.

- a. Provide a list and the amounts of the inapplicable expenses referred to in the response.
 - b. Provide a list and amounts of the incorrectly allocated amounts referred to in the response.
3. Refer to the Vilines Testimony, page 6, lines 22–24.
- a. Provide copies of all workpapers and calculations in Excel spreadsheet format, with all formulas unprotected and with all rows and columns accessible, supporting the \$569,900 wholesale revenue requirement.
 - b. State all assumptions made and describe all methods used to determine the wholesale revenue requirement.
 - c. Provide copies of all workpapers and calculations in Excel spreadsheet format, with all formulas unprotected and with all rows and columns accessible, supporting the \$2.59 per 100 cubic feet rate.
 - d. State all assumptions made and describe all methods used to determine the wholesale rate of \$2.59 per 100 cubic feet.



Kent A. Chandler
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED MAR 27 2020

cc: Parties of Record

*L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Dailey E Wilson
Wilson Law Firm, PLLC
635 Trade Avenue
PO Box 460
Eddyville, KENTUCKY 42038

*Princeton Water and Wastewater
101 E. Market Street
Princeton, KY 42445

*James Noel
Superintendent
Princeton Water and Wastewater
101 E. Market Street
Princeton, KY 42445

*Princeton Water and Wastewater
Princeton Water and Wastewater
101 E. Market Street
Princeton, KY 42445

*Caldwell County Water District
118 West Market Street
Princeton, KY 42445

*Tracy Musgove
Director of Finance
Princeton Water and Wastewater
101 E. Market Street
Princeton, KY 42445

*Lyon County Water District
5464 U. S. Highway 62 West
P. O. Box 489
Kuttawa, KY 42055

*Mark David Goss
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Marvin L Wilson
Wilson Law Firm, PLLC
635 Trade Avenue
PO Box 460
Eddyville, KENTUCKY 42038