

DEC 11 2019

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF ALLEN COUNTY WATER)
 DISTRICT FOR THE ISSUANCE OF A)
 CERTIFICATE OF PUBLIC CONVENIENCE AND)
 NECESSITY TO CONSTRUCT A WATER SYSTEM) CASE NO. 2019-00398
 IMPROVEMENTS PROJECT AND AN ORDER)
 AUTHORIZING THE ISSUANCE OF SECURITIES)
 PURSUANT TO KRS 278.020, KRS 278.300)
 AND 807 KAR 5:001)

** *** **** ***** **** *** **

RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION

The Applicant, Allen County Water District (the "District"), by Counsel, files this Response to the December 4, 2019 Commission Staff's Initial Request for Information as follows:

Responding Witness to Request: Matthew R. Curtis, P.E., Bluegrass Engineering PLLC.

Request No. 1. Refer to the Application, paragraph 5(vi) on page 3, and paragraph 10 on page 6. Paragraph 5(vi) refers to a special condition for a resolution to increase rates for a 7 percent increase in revenues or \$160,000 of additional revenues effective January 1, 2021. Paragraph 10 states that no rate adjustment will be necessary. Reconcile the discrepancies between these two paragraphs.

Response No. 1. The KIA Commitment Letter, special condition required the District to adopt a resolution to increase water rates by seven percent or \$160,000 of additional revenues. The District has implemented a Water Loss Reduction Program and is replacing their existing meters with new meters due to a high number of failure of the existing meters. The effect of the Water Loss Reduction Program and the new meters should generate additional revenues sufficient to satisfy the special condition in the KIA Commitment Letter. The District has not requested approval of a rate increase in this Case. If the predicted revenue increase does not happen, then the District will submit a rate case in order to comply with the special condition of KIA.

Certification of Responses to Commission Staff's Initial Request for Information

I hereby certify that I have supervised the preparation of Allen County Water District's Response to the Commission Staff's Initial Request for Information. This Response is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Matthew Curtis, P.E.
Registered Professional Engineer
State of Kentucky No. 25716

Respectfully Submitted,
Rubin & Hays

By 

W. Randall Jones, Esq.
Kentucky Home Trust Building
450 South Third Street
Louisville, Kentucky 40202
Phone: (502) 569-7525
Fax: (502) 569-7555
Counsel for Allen County Water District
wrjones@rubinhays.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Response was duly mailed by first class United States Postal Service mail to all parties of record in this proceeding on this 9th day of December, 2019.



W. Randall Jones, Esq.
Kentucky Home Trust Building
450 South Third Street
Louisville, Kentucky 40202
Phone: (502) 569-7525
Fax: (502) 569-7555
Counsel for Allen County Water District