

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC EMERGENCY DOCKET |) | CASE NO. |
| RELATED TO THE NOVEL CORONAVIRUS |) | 2020-00085 |
| COVID-19 |) | |

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION TO WARREN COUNTY WATER DISTRICT, BUTLER COUNTY WATER SYSTEM, SIMPSON COUNTY WATER DISTRICT, OLDHAM COUNTY WATER DISTRICT, OHIO COUNTY WATER DISTRICT, NORTHERN KENTUCKY WATER DISTRICT, BOONE COUNTY WATER DISTRICT, HARDIN COUNTY WATER DISTRICT #1, HARDIN COUNTY WATER DISTRICT #2, MOUNTAIN WATER DISTRICT, SOUTH HOPKINS WATER DISTRICT, MCCREARY COUNTY WATER DISTRICT, WOOD CREEK WATER DISTRICT, HYDEN-LESLIE COUNTY WATER DISTRICT, HENDERSON COUNTY WATER DISTRICT, CANNONSBURG WATER DISTRICT, GREEN RIVER VALLEY WATER DISTRICT, MUHLENBERG COUNTY WATER DISTRICT #3, AND GRAYSON COUNTY WATER DISTRICT

The above-noted utilities, pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on July 7, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, the above-noted utilities SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall 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. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. **Provide all data in Excel format.**

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

The above-noted utilities shall make timely amendment to any prior response if they obtain 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 the above-noted utilities fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their failure to completely and precisely respond. Given the nature of the questions and their timing, the Commission understands each utility may not be able to access the information requested herein.

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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, the above-noted utilities 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 utility's current number of customers and the date used for that determination.

2. If applicable, provide the utility's current number of customers per class.

3. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average total bill for all customers for:

- a. 2017 as a year, not each month;
- b. 2018 as a year, not each month;
- c. 2019 as a year, not each month; and
- d. Each month in 2020.

Total bill is defined as including charges for current service and past service that is unpaid, including the accumulation of fees.

4. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average total bill for all customers in each class for:

- a. 2017 as a year, not each month;
- b. 2018 as a year, not each month;
- c. 2019 as a year, not each month; and
- d. Each month in 2020.

Total bill is defined as including charges for current service and past service that is unpaid, including the accumulation of fees.

5. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average bill for current service for all customers for:

- a. 2017 as a year, not each month;
- b. 2018 as a year, not each month;
- c. 2019 as a year, not each month; and
- d. Each month in 2020.

6. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average bill for current service for all customers in each class for:

- a. 2017 as a year, not each month;
- b. 2018 as a year, not each month;
- c. 2019 as a year, not each month; and
- d. Each month in 2020.

The differences between request 3 and request 5, and request 4 and request 6 should provide the average arrearage for all customers and for each class, respectively.

7. Explain how the utility calculates bad debt.
 - a. Explain the decision criteria governing when the utility writes off bad debt.
 - b. Provide the monthly bad debt write-offs for each month in 2018, 2019 and 2020.
 - c. If the utility has changed its calculation or determination of bad debt in the past two years, explain its previous calculation or determination of bad debt and the reason for the change.
8. Assuming the Commission's moratorium on disconnections was not in effect, provide the number of customers in each class that would be subject to disconnection, and the date used for this determination.
9. Provide the percent of customers, by class, that pay on time for:
 - a. 2017 as a year, not each month;
 - b. 2018 as a year, not each month;
 - c. 2019 as a year, not each month; and
 - d. Each month in 2020.
10. Provide the following information for January 1, 2015, until December 31, 2019. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Further, provide the following information by class.

- a. Provide monthly totals of service termination notices issued to customers only for nonpayment of bills.
- b. Provide monthly totals of service terminations for customers only for non- payment of bills.
- c. Provide the total number of customers for each month.

This information should be provided so as not to duplicate customer counts. The information requested in this request should be presented similarly to the residential-only information provided in Case No. 2019-00366.² For reference, refer to Louisville Gas and Electric Company and Kentucky Utilities Company's response to Post-Formal Conference Request for Information filed with the Commission on March 6, 2020.

11. Provide the total income received from late payment fees for:
 - a. Each month in 2017;
 - b. Each month in 2018;
 - c. Each month in 2019; and
 - d. Each month in 2020.
12. Quantify the amount of late payment fees the utility would have assessed since March 16, 2020, absent the Commission's directive.
13. Provide copies of all general communication provided to customers regarding arrearages, late payments, payment plans, etc. since March 16, 2020. Customer-specific communication is excluded from this request.

² Case No. 2019-00366, *Electronic Investigation Into Home Energy Assistance Programs Offered by Investor-Owned Utilities Pursuant to KRS 278.285(4)* (Ky. PSC May 4, 2020).

14. Provide a detailed explanation and breakout of any cost increases and decreased income (by customer class if applicable) the utility has experienced as a result of the COVID-19 State of Emergency.

15. Provide a detailed explanation and breakout of any cost decreases and increased income the utility has experienced as a result of the COVID-19 State of Emergency.

16. Provide any additional information or data the utility believes the Commission should consider in amending or vacating its previous Orders in this matter.



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DATED JUN 23 2020

cc: Parties of Record

