## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

## ELECTRONIC INVESTIGATION INTO THE)CASE NO.FINANCIAL AND OPERATIONAL CONDITION)2021-00211OF THE UNION COUNTY WATER DISTRICT))

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO UNION COUNTY WATER DISTRICT

Union County Water District (Union District), 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 October 30, 2021. The Commission directs Union District to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. 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 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.

<sup>&</sup>lt;sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

Union District shall make timely amendment to any prior response if Union District obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Union District fails or refuses to furnish all or part of the requested information, Union District 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Union 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 affidavit filed in Case No. 2021-00180<sup>2</sup> on May 4, 2021, page 16. Union District states that it estimates that taking into consideration the months of January through March, a refund of approximately \$2,501 is estimated would be necessary if Union District's customers were refunded.

a. Confirm the dates Union District began the overbilling and then ceased the overbilling of customers.

-2-

<sup>&</sup>lt;sup>2</sup> Case No. 2021-00180, *Electronic Purchased Water Adjustment Filing of Union County Water District* (filed May 4, 2021), Affidavit at 16.

b. Provide the actual amounts overbilled by Union District and include the supporting calculations.

2. Refer to Office Manager Kim Mayes's Affidavit.<sup>3</sup>

a. Explain the method and provide all elements used by Ms. Mayes to estimate the stated 420 work hours necessary for issuing the refund.

b. Provide a breakdown of how the 420 work hours will be used to calculate the refund.

c. Explain or confirm whether the data stored within the Utility Billing System used by Union District can be exported to an external application, such as Excel, to streamline the refund calculation process, or whether the refunds must be strictly calculated within the confines of the Utility Billing System.

Linda C. Bridwell, PE Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED SEP 27 2021

cc: Parties of Record

<sup>&</sup>lt;sup>3</sup> Union District's Response to the Commission's June 7, 2021 Order (filed June 16, 2021).

\*Stephen Arnett Arnett Law Office, PLLC P.O. Box 419 109 South Main St Morganfield, KENTUCKY 42437

\*Robert Baird CPA

\*Kara Bickett Union County Water District 409 North Court Street P. O. Box 146 Morganfield, KY 42437

\*Union County Water District 409 North Court Street P. O. Box 146 Morganfield, KY 42437

\*Union County Water District Union County Water District 409 North Court Street P. O. Box 146 Morganfield, KY 42437