

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MADISON)	CASE NO.
COUNTY UTILITIES DISTRICT FOR AN)	2021-00218
ALTERNATIVE RATE ADJUSTMENT)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO MADISON COUNTY UTILITIES DISTRICT

Madison County Utilities District (Madison District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on September 24, 2021. The Commission directs Madison District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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.

¹ 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).

Madison District shall make timely amendment to any prior response if Madison 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 Madison District fails or refuses to furnish all or part of the requested information, Madison 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, Madison 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 confirmation whether Madison District has replaced any existing meters in the past five years with AMI/AMR meters.
 - a. If confirmed, provide the approximate percentage of total system meters that were replaced as well as the undepreciated plant value associated with the meters that were replaced.
 - b. Confirm whether Madison District received approval for a CPCN authorizing the installation of AMI/AMR meters.
 - c. Provide the Case Numbers of all cases in which the Commission granted Madison District a CPCN or otherwise approved the replacement of meters.

2. Explain whether Madison District's infrastructure will be or is being used to expand broadband infrastructure in Madison County and, if so:

a. Confirm if any broadband wires have been installed in existing Madison District's water lines. If so, provide a list of the owners of the pipe as well as the broadband wires.

b. Identify the parties involved in the project.

c. Describe the status of the project.

d. Provide the cost of the project to Madison District and who is paying the costs.

e. Describe the impact of the project on Madison District's infrastructure.

f. State how many access and egress points are required for the project.

g. If the project has begun, explain why Madison District did not request Commission approval of a certificate of public convenience of necessity (CPCN) prior to the construction in accordance with KRS 278.020.

h. If the project has not begun, state whether Madison District will request a CPCN from the Commission and what date Madison District expects to file the application for a CPCN as well a detailed description including:

(1) A complete description of the project including how the wires will be installed.

(2) What party will own the mains.

(3) What party will own the wires.

(4) What party will be responsible for maintenance on the water mains.

(5) What party will be responsible for maintenance on the wires.

(6) Copies of any contracts or agreements between parties spelling out costs, ongoing expense allocations, revenues, and operations.

3. Provide copies of all documentation provided to the Kentucky Division of Water regarding a proposal or project to install broadband wires within the water mains.

4. Refer to Commissions Staff's First Request for Information (Staff's First Request), Item 6.

a. Explain whether Madison District field service personnel are responsible for the Meter Drop.

b. If not, identify who is responsible for the Meter Drop.

c. If contracted personnel are responsible, provide contracts with these contracted personnel to provide this service.

5. Refer to Staff's First Request, Item 7, Madison District proposes to raise its monthly water service rates by an across-the-board percentage amount.

a. Provide an explanation of how the across-the-board percentage increase method to increase monthly water service rates was chosen.

b. Provide a list of alternative methods Madison District considered and an explanation as to why each alternative was not chosen to increase its monthly water service rates.

6. Refer to Staff's First Request, Item 8, Madison District's Application, Attachment Billing Analysis.

a. Provide the source of the 2019 usage data presented in the Billing Analysis, and state whether any adjustments were made to the data.

b. Provide the billing analysis provided in this response in the proper format as shown in ARF Form 1 - Attachment BA-DB - Billing Analysis Form - Declining Block Rates Instructions.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED SEP 10 2021

cc: Parties of Record

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