

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO	)	
WHOLESALE WATER RATES CHARGED BY	)	
THE CITY OF CARLISLE TO SHARPSBURG	)	CASE NO.
WATER DISTRICT AND NICHOLAS COUNTY	)	2021-00382
WATER DISTRICT PURSUANT TO KRS 278.200,	)	
KRS 278.160, KRS 278.180, KRS 278.190 AND	)	
807 KAR 5:011	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO THE CITY OF CARLISLE

The city of Carlisle (Carlisle), 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 November 9, 2021. The Commission directs Carlisle 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

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<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).

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Carlisle shall make timely amendment to any prior response if Carlisle 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 Carlisle fails or refuses to furnish all or part of the requested information, Carlisle 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, Carlisle shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. For the period January 1, 2019, to present, provide detailed billing records showing Carlisle's monthly billings to Sharpsburg Water District (Sharpsburg District) and Nicholas County Water District (Nicholas District) over the requested period.

2. Refer to Appendix C of the Commission's October 20, 2021 Order in this proceeding. For any months in which Carlisle billed Sharpsburg District and Nicholas District different rates than those in Appendix C, provide the rate schedule that was billed and explain why rates not on file with this Commission were billed.

3. a. Identify all entities to which Carlisle provides wholesale water service.
- b. Provide for each customer listed above, the previous 24 months monthly water usage and the amount that Carlisle charged it for service.
4. Provide a copy of the cost of service study (COSS), if any, upon which the proposed rate is based in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.
5. If the proposed rate is not based upon a COSS, describe how Carlisle determined the proposed wholesale rate and state who participated in the determination. Provide all supporting documentation for the proposed rate.
6. Provide any studies or analyses performed by Carlisle that were used to determine the reasonableness of the proposed wholesale rate schedule.
7. State the period (test period) Carlisle used for its financial data to determine the proposed wholesale rate schedule.
8. Provide the financial statements that support the test period identified in Item 7.
9. Provide the independent auditor's reports for Carlisle for the fiscal years ending 2019, 2020, and 2021 if available.
10. Identify the owner of the master meter(s) through which Carlisle provides water to its wholesale customers.
  - a. Provide the number of master meters that Carlisle provides wholesale water service to each of the wholesale customers.

b. Identify the party responsible (Carlisle or wholesale customer) for maintaining these master meters.

11. State whether Carlisle provides unmetered water service to any entities (e.g., service to municipal buildings, fire departments, or protection services). For each type of unmetered service, estimate the percentage of the estimated unmetered gallons provided in the test year.

12. State the annual effect of the proposed rate adjustment on Carlisle's revenues to each of its wholesale water service customers. Show all calculations made and state all assumptions used to derive this response. Provide this in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

13. Provide the ordinance or resolution of the city council or similar governing body in which the proposed rate adjustment was approved.

14. Provide the minutes of each city council meeting in which a proposed rate adjustment to Carlisle's wholesale customers was discussed.

15. Provide a copy of all correspondence, electronic mail messages, or other written communications between Carlisle and its wholesale customers regarding the current proposed revisions to Carlisle's wholesale rates.



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Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED OCT 25 2021

cc: Parties of Record

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