

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF )  
GRAYSON COUNTY WATER DISTRICT AND )  
THE CITY OF CANEYVILLE FOR AN ORDER )  
APPROVING THE TRANSFER OF OWNERSHIP )  
OF THE CITY OF CANEYVILLE'S WATER )  
SYSTEM AND APPROVING GRAYSON COUNTY )  
WATER DISTRICT'S ASSUMPTION OF CERTAIN )  
DEBT OBLIGATIONS OF THE CITY OF )  
CANEYVILLE PURSUANT TO THE PROVISIONS )  
OF KRS 278.020, KRS 278.300, AND 807 KAR )  
5:001 )

CASE NO.  
2021-00387

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

Grayson County Water District (Grayson 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 March 25, 2022. The Commission directs Grayson 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 question to which the response is made and 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

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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).

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.

Grayson District shall make timely amendment to any prior response if Grayson 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 Grayson District fails or refuses to furnish all or part of the requested information, Grayson 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, Grayson 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 Application, page 6.
  - a. Provide documentation to substantiate or explain the statement that the merger will result in economies of scale for the city of Caneyville.

b. Provide minutes from the Caneyville City Commission meeting when the proposed merger was confirmed by the City Commission.

c. Explain why the city of Caneyville decided to allow another utility to assume control of Caneyville's water system.

2. Refer to the Application, Exhibit 10, page 4. Provide an explanation as to the steps or plans Grayson District will implement to reduce the city of Caneyville's excess water loss.

3. For the years 2020, 2021, and 2022 to the present day, list any notices of violation from the Kentucky Division of Water for the city of Caneyville's water system.

4. For the years 2020, 2021, and 2022 to the present day, list any agreed orders with the Kentucky Division of Water that the city of Caneyville's water system is working under.

5. Confirm that allowing the city of Caneyville's customers to be charged the same rate as Grayson District's current customers will provide Grayson District enough revenue to cover the assumed debt service payments.

6. Refer to Application, pages 17–18, which states that Grayson District has been managing, operating, repairing, and maintaining the city of Caneyville's water system since April 12, 2021, using Grayson District's existing employees. Provide any documentation of approval for this activity, including but not limited to meeting minutes from Grayson District's board meetings and the city of Caneyville Commission meetings.

7. Refer to Application, page 70. Explain and provide supporting documentation for assets used by the city of Caneyville that will not be transferred to

Grayson District that could assist with the district providing safe, reliable water service, specifically two trucks and a backhoe.

8. Provide documentation to support Grayson District's assertion that Grayson District can absorb the city of Caneyville's water service without hiring any new employees.

9. Provide all documentation of overtime for all Grayson District employees from April 12, 2021, to the present day.



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

DATED     MAR 08 2022    

cc: Parties of Record

\*Honorable Damon R Talley  
Attorney at Law  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Grayson County Water District  
21 Shull White Road  
P. O. Box 217  
Leitchfield, KY 42754

\*Kevin Shaw  
Manager  
Grayson County Water District  
21 Shull White Road  
P. O. Box 217  
Leitchfield, KY 42754

\*Tara N. Ward  
Attorney  
PO Box 151  
Hartford, KENTUCKY 42347