

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LYON COUNTY)	CASE NO.
WATER DISTRICT FOR A RATE ADJUSTMENT)	2021-00391
PURSUANT TO 807 KAR 5:076)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO LYON COUNTY WATER DISTRICT

Lyon County Water District (Lyon 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 10, 2022. The Commission directs Lyon 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 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 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

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).

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

Lyon District shall make a timely amendment to any prior response if Lyon District obtains the information that indicates the response was incorrect when made or, though correct when made, is now inaccurate in any material respect. For any request to which Lyon District fails or refuses to furnish all or part of the requested information, Lyon 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 legibility. 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, Lyon District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal data cannot be read.

1. Refer to Lyon District's response to Commission Staff's First Request for Information (Staff's First Request), Item 1f. For each employee, provide a breakdown of employee hours worked between normal hours worked and overtime hours worked.

2. Refer to Lyon District's response to Staff's First Request, Item 1g. Provide a complete list of all part-time employees currently employed at Lyon District, including pay rate.

3. Refer to Lyon District's response to Staff's First Request, Item 3. Provide a breakdown of the gallons purchased, by month, from each water supplier separately stated for the calendar year ended December 31, 2020.

4. Refer to Lyon District's response to Staff's First Request, Item 6. Provide a schedule, such as the one in the response, showing the total amount collected for each nonrecurring charge listed in the response and the number of occurrences for each calendar year 2017, 2018, 2019, and 2021.

5. Refer to Lyon District's response to Staff's First Request, Item 7. Provide the average number of miles used to determine the transportation expense listed in the Cost Justification Sheets for each nonrecurring charge.

6. Refer to the Application, Exhibit C, Schedule of Adjusted Operations- Water utility, References, Adjustment F.

a. Provide the amounts recorded on the general ledger for account 630.03, Contractual Services-Legal for each calendar year 2017, 2018, 2019, and 2021.

b. Provide the current contract with Thurman Campbell referenced in the adjustment.



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

DATED FEB 23 2022

cc: Parties of Record

Case No. 2021-00391

*Lyon County Water District
5464 U. S. Highway 62 West
P. O. Box 489
Kuttawa, KY 42055

*Michael Hansen
HDR, Inc.
120 Brentwood Commons Way
Suite 525
Brentwood, TENNESSEE 37027