

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF THE CITY OF)	
MANCHESTER REVISING ITS WHOLESALE)	CASE NO.
WATER SERVICE RATES TO NORTH)	2022-00139
MANCHESTER WATER ASSOCIATION)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE CITY OF MANCHESTER

The city of Manchester (Manchester), 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 August 5, 2022. The Commission directs Manchester 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.

Manchester shall make timely amendment to any prior response if Manchester 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 Manchester fails or refuses to furnish all or part of the requested information, Manchester 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, Manchester 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 Commission Staff's First Request for Information (Staff's First Request) Item 1. In its response, Manchester neglected to provide any explanation or support for its proposed rate of \$2.50 per 1,000 gallons to North Manchester Water Association. Additionally, Manchester did not provide any explanation or support for its proposed increases of \$0.50 per 1,000 gallons for the next three years, or its increase of 13 percent for five years after that. Explain, in detail, and provide all supporting

calculations for Manchester’s proposed wholesale rate of \$2.50 per 1,000 gallons and subsequent increases for the following eight years.

2. Refer to Staff’s First Request, Items 2 and 6. Manchester provided a document titled “Water Rate Analysis” that was performed in the Fall of 2019. Explain why Manchester is providing a “rate analysis” for a test period from January 2018 to December 2018 when it states that it is using fiscal year 2021 as the test period upon which it based its proposed rate adjustments.

3. Provide the information requested in the following tables:

City of Manchester					
Schedule of All Mains and Jointly Used Mains					
Total System				Jointly used	
Main Size	Length (Feet)	Miles of Mains	Inch Miles	Miles of Mains	Inch Miles
24					
20					
16					
12					
10					
8					
6					
4					
3					
2					
Totals					

City of Manchester
Water Produced, Sold and Used

Line #		Fiscal Year 2019		Fiscal Year 2020		Fiscal Year 2021	
		Gallons	Percentage	Gallons	Percentage	Gallons	Percentage
1	Water Produced and Purchased:						
2	Water Produced						
3	Water Purchased						
4							
5	Total Water Produced and Purchased						
6	Water Sales:						
7	Residential, Commercial, and Industrial						
8	Wholesale						
9	Public Authority						
10							
11	Total Water Sales						
12	Other Water Used:						
13	Utility/water treatment plant						
14	wastewater Plant						
15	System Flushing						
16	Fire Department						
17	Other Usage (Explain)						
18							
19	Total Other Used						
20							
21	Water Loss						
22							
23	Water Loss Percentage (Line 21 ÷ Line 5)						

4. Refer to Manchester’s Response to Staff’s First Request, Item 7.

Manchester stated that its independent audit report for fiscal year 2021 has not been completed.

a. Provide the date Manchester expects that the 2021 Audit will be completed.

b. Provide a detailed explanation as to why Manchester completed its rate analysis before the fiscal year 2021 audit had yet to be officially completed.

5. State the annual effect the proposed wholesale rate adjustment(s) will have on Manchester’s revenues. Show all calculations made and state all assumptions used to derive this response. Provide this in an Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

6. Provide the information below:

- a. Identify all entities to which Manchester provides wholesale water service.
 - b. Provide for each customer listed above, the previous 24 months monthly water usage and the amount that Manchester charged it for service.
7. Provide the ordinance or resolution of the city council or similar governing body in which the proposed rate adjustment(s) were approved.
 8. Provide the minutes of each city council meeting in which Manchester's proposed wholesale rate adjustment(s) were discussed.
 9. Provide a copy of all correspondence, electronic mail messages, or other written communications between Manchester and its wholesale customer regarding the current proposed revisions to Manchester's wholesale rates.



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

DATED JUL 21 2022

cc: Parties of Record

*City of Manchester
123 Town Square
Manchester, KY 40962

*Jenna Corum
213 Main Street
P. O. Box 887
Manchester, KENTUCKY 40962

*Mike White
City of Manchester
123 Town Square
Manchester, KY 40962