

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF WATER	)	
SERVICE CORPORATION OF KENTUCKY FOR	)	
A GENERAL ADJUSTMENT IN EXISTING RATES	)	CASE NO.
AND A CERTIFICATE OF PUBLIC	)	2022-00147
CONVENIENCE AND NECESSITY TO DEPLOY	)	
ADVANCED METERING INFRASTRUCTURE	)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION  
TO WATER SERVICE CORPORATION OF KENTUCKY

Water Service Corporation of Kentucky (Water Service Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than December 9, 2022. The Commission directs Water Service Kentucky 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 representatives of a public or private corporation or a partnership or association or a

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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).

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.

Water Service Kentucky shall make timely amendment to any prior response if Water Service Kentucky 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 Water Service Kentucky fails or refuses to furnish all or part of the requested information, Water Service Kentucky shall provide a written explanation of the specific grounds for its failure to respond completely and precisely.

Careful attention shall be given to copied and scanned 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, Water Service Kentucky 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 an affidavit from publisher, Kevin Smith, affirming that the public notice of the hearing was published in compliance with 807 KAR 5:001, Section 9(2)(b).
2. Refer to the hearing testimony, generally, of Quentin M. Watkins, regarding Middlesboro-area datasets containing confidential compensation data from a survey of

other Kentucky regulated utilities and two proprietary compensation analysis tools. State the number of survey responses that are from Middlesboro or Bell County, Kentucky.

3. Refer to the hearing testimony of Shawn M. Elicegui regarding an agreement between Water Services Corporation (WSC) and Water Service Kentucky for WSC to provide services necessary for Water Service Kentucky to meet its statutory obligations. State whether this agreement been approved by the Commission and, if so, provide a copy of the order approving the agreement.

4. Refer to the hearing testimony of Mr. Elicegui, generally. Provide a copy of any corporate policy, manual, or any other written support for the assertion that WSC officers, directors, managers, and employees have a fiduciary duty to Water Service Kentucky and Water Service Kentucky's customers.

5. Refer to the hearing testimony of Mr. Elicegui, generally. Provide the name and nature of employment of the WSC employee who reviews and approves on behalf of Water Service Kentucky the allocation of expenses from WSC to Water Service Kentucky.

6. Refer to the hearing testimony of Dylan W. D'Ascendis. Also refer to the Direct Testimony of Mr. D'Ascendis, page 22, which includes a portion of an order from the South Carolina Public Service Commission, Docket No. 2017-292-WS. Provide a complete copy of the cited Order.

7. Provide a list of the current officers of WSC and the how they are selected for their positions.

8. Provide a list of positions that have become vacant since the application in this case was filed, and the forecasted and actual salary, forecasted and actual 401K and forecasted and actual payroll tax for each position.

9. Provide the accounting entries for bad debt expenses that were written off in the past 36 months.

10. Provide WSC or Water Service Kentucky's written policy that states how bad debt is booked and written off.

11. State whether Water Service Kentucky, WSC, or Corix sells Water Service Kentucky's accounts receivable. If so, state to whom the accounts receivable are sold.

12. Provide the names of other operating subsidiaries of Corix or WSC that are currently using the Neptune AMI system.

13. Refer to the hearing testimony of Seth Whitney, generally. Provide documentary evidence of any increased revenues due to improved meter accuracy by other operating subsidiaries of Corix or WSC currently using the Neptune AMI system.

14. Refer to the hearing testimony of Mr. Whitney, generally. Provide the names of each operating subsidiary of Corix or WSC that are currently in the process of switching to the Neptune AMI system.

15. Refer to the hearing testimony of Mr. Whitney, generally. Provide the names of any other operating subsidiary of Corix or WSC that were required to perform a benefit-cost analysis relating to the AMI system and provide copies of the benefit-cost analysis including the assumptions used in preparing the analysis.

16. Refer to the hearing testimony of Mr. Whitney, generally. Provide documentation that Water Service Kentucky's current meters are registering a flow rate slower than the accuracy requirements in 807 KAR 5:066, Section 15.

17. Refer to the hearing testimony of Mr. Whitney, generally. Provide copies of any documents that supports Mr. Whitney's statement that Corix evaluated the least cost options for meter replacement for Water Service Kentucky.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED DEC 02 2022

cc: Parties of Record

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