## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

I	ln	th	10	M	latter	Of:

ELECTRONIC TARIFF FILING OF THE CITY OF	)	CASE NO.
HARRODSBURG WATER DEPT. REVISING ITS	)	2022-00349
WHOLESALE WATER SERVICE RATES	)	

## COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO CITY OF HARRODSBURG WATER DEPT.

City of Harrodsburg Water Dept. (Harrodsburg), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on February 9, 2023. The Commission directs Harrodsburg 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 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

<sup>&</sup>lt;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).

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

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

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, Harrodsburg shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

- 1. Provide the number of customers served by the water and the sewer divisions for fiscal years 2019–2022.
- 2. Refer to Harrodsburg's response to Commission Staff's First Request for Information (Staff's First Request), Item 5. Excel Workbook: DR 1-05\_Depreciation\_Expense.xls; Tab: 2021. The assets listed on Harrodsburg's Depreciation schedule are broken down by account number. Provide a schedule listing each account number, account title, and a brief description of assets included in each

account. Include in the schedule if the assets reported in each account are for the water division, the sewer division, or are a shared asset category.

- 3. Refer to Harrodsburg's response to Staff's First Request Item 5.a. Provide a detailed explanation as to why Harrodsburg's auditor has traditionally divided the depreciation expense evenly between Harrodsburg's water and sewer divisions.
- 4. Refer to Harrodsburg's response to Staff's First Request, Item 5.b. Provide a detailed explanation as to why Harrodsburg cannot produce a separate depreciation schedule for its water and sewer divisions.
- 5. Refer to Harrodsburg's response to Staff's First Request, Item 3, Excel Workbook: DR\_1-03\_\_04\_-\_FY2021\_GL\_Trial\_Balance.xls. For each expenditure listed in the table below, provide the following: a detailed description of the expenditure; identify whether any of the expenditures have been capitalized; identify whether the expenditure is for the water division, the sewer division, or it is shared between the divisions; and provide copies of all invoices or work orders related to that expenditure.

Account					
Number	Title	Date	Vendor	Check No.	Amount
05-102-5041	Maintenance and Repairs	07/15/20	SHAKVILL - Shaker Village	Ck# 21975	\$ 1,742.82
05-102-5041	Maintenance and Repairs	09/15/20	COREMAIN - Core & Main	Ck# 22172	12,261.50
05-102-5041	Maintenance and Repairs	09/16/20	ENTFLEET - Enterprise FM Trust	Ck# 22191	1,095.39
05-102-5041	Maintenance and Repairs	09/29/20	INCONTRO - InControl Technical Solutions LLC	Ck# 22216	3,300.00
05-102-5041	Maintenance and Repairs	09/29/20	YOUNGSPR - Young's Professional Services, LLC	Ck# 22222	1,000.00
05-102-5041	Maintenance and Repairs	09/29/20	INCONTRO - InControl Technical Solutions LLC	Ck# 22216	1,300.00
05-102-5041	Maintenance and Repairs	10/13/20	H&AResou - H&A Resource Management	Ck# 22277	38,301.65
05-102-5041	Maintenance and Repairs	11/20/20	S4WATSAL - S4 Water Sales and Services, LLC	Ck# 22440	1,985.55
05-102-5041	Maintenance and Repairs	12/09/20	INCONTRO - InControl Technical Solutions LLC	Ck# 22490	2,200.00
05-102-5041	Maintenance and Repairs	03/05/21	INCONTRO - InControl Technical Solutions LLC	Ck# 22771	2,300.00
05-102-5041	Maintenance and Repairs	04/13/21	FauElect - Faust Electric LLC	Ck# 22892	1,306.15
05-102-5041	Maintenance and Repairs	04/13/21	S4WATSAL - S4 Water Sales and Services, LLC	Ck# 22900	15,360.00
05-102-5041	Maintenance and Repairs	04/23/21	INCONTRO - InControl Technical Solutions LLC	Ck# 22969	2,300.00

6. Refer to Harrodsburg's response to Staff's First Request, Item 10. Provide the employee health Insurance annual premiums for Fiscal Year 2021 as requested in the table below.

Harrodsburg's	Employee's	Total
Premium	Premium	Emp. Health
Contribution	Contribution	Ins. Premium

Single Parent Plus Employee & Spouse Family

- 7. Identify the amount of Harrodsburg's County Employee Retirement System obligation and payments that were reported by the water division in Fiscal Year 2021.
- 8. Refer to Harrodsburg's December 21, 2022 motion regarding its proposed 36-month surcharge to recover the cost of this instant case. Provide the following information concerning the costs for the preparation of this case:
- a. A detailed schedule of expenses incurred to date for the following categories:
  - (1) Accounting;
  - (2) Engineering;
  - (3) Legal;
  - (4) Consultants; and
  - (5) Other Expenses (Identify separately).
- b. For each category identified in Item 8.a., the schedule should include the date of each transaction, the check number or other document reference, the vendor, the hours worked, the rates per hour, the amount, a description of the services performed, and the account number in which the expenditure was recorded. Provide copies of contracts or other documentation that support charges incurred in the preparation of this case. Identify any costs incurred for this case that occurred during the base period.

Expenses should be broken down into the same categories as identified in Item 8.a., with an estimate of the hours to be worked and the rates per hour. Include a detailed

explanation of how the estimate was determined, along with all supporting workpapers

An itemized estimate of the total cost to be incurred for this case.

and calculations.

month of the public hearing.

d. Provide monthly updates of the actual costs incurred in conjunction with this rate case, reported in the manner requested in Items 8.a. and 8.b., and a cumulative total of cost incurred to date for each category. Updates will be due when Harrodsburg files its monthly financial statements with the Commission, through the

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED \_\_\_JAN 25 2023

cc: Parties of Record

\*City of Harrodsburg Water Dept. 208 South Main Street Harrodsburg, KY 40330

\*Amy Kays-Huffman City of Harrodsburg Water Dept. 208 South Main Street Harrodsburg, KY 40330

\*James W Gardner Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street Suite 1400 Lexington, KENTUCKY 40507

\*Rebecca C. Price Sturgill, Turner, Barker & Moloney 155 East Main Street Lexington, KENTUCKY 40507

\*M. Todd Osterloh Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street Suite 1400 Lexington, KENTUCKY 40507