

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KNOX COUNTY)	
UTILITY COMMISSION FOR AUTHORIZATION)	
TO EXECUTE AN ASSISTANCE AGREEMENT)	
WITH THE KENTUCKY INFRASTRUCTURE)	CASE NO.
AUTHORITY AND FOR A CERTIFICATE OF)	2023-00003
PUBLIC CONVENIENCE AND NECESSITY TO)	
CONSTRUCT THE BARBOURVILLE)	
CONNECTION-KY 225 PROJECT)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO KNOX COUNTY UTILITY COMMISSION

Knox County Utility Commission, (Knox County Commission) 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 March 10, 2023. The Commission directs Knox County Commission 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

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).

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.

Knox County Commission shall make timely amendment to any prior response if Knox County Commission obtains information that indicates the response was incorrect or incomplete when made or, though correct when made, is now incorrect or incomplete in any material respect.

For any request to which Knox County Commission fails or refuses to furnish all or part of the requested information, Knox County Commission 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, Knox County Commission shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Knox County Commission's response to Commission Staff's First Request for Information (Staff's First Request), Item 4(f).

a. State the earliest date the two unlicensed operators can obtain their licenses.

b. State any reason why Knox County Commission's two licensed or certified operators are insufficient to run the treatment plant at a level that allows Knox County Commission to meet its water demand and comply with certification statues or regulations.

c. State how Knox County Commission is currently utilizing its two licensed operators to maximize plant output, how much that output is, and whether water needs are still able to be met.

d. Explain how the proposed plan is the least-cost reasonable alternative compared to allowing the two additional operators to obtain their certification or increasing the salary offered to potential certified operator applicants.

2. Refer to Knox County Commission's response to Staff's First Request, Item 4(c). Response is incomplete. State any remaining depreciation on the water treatment plant to be recovered in rates.

3. Describe any plans Knox County Commission has to sell water to Barbourville Utilities Commission.

4. State where Barbourville Utility Commission's water comes from.

5. Refer to Knox County Commission's response to Staff's First Request, Item 2(b). State the estimated cost of replacing the 2,100 linear ft. of main if not performed at the same time as the Barbourville Utilities Commission connection upgrade.

6. Provide copies of each of the following, and when appropriate, provide in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

a. Provide a description of all employee benefits, other than salaries and wages, paid to, or on behalf of, each licensed operator for the calendar years 2022 and year to date 2023.

b. Provide a copy of one invoice for 2022 for each licensed operator benefit described above.

c. Using a table format, provide an Excel document that describes job titles, hours worked, pay rates, total wages paid, and total FICA cost for each Knox County Commission licensed operators on December 31, 2021, and December 31, 2022. A total column that includes total wages by licensed operator (regular wages and overtime) should be provided.

d. Provide the minutes from Knox County Commission Board of Commissioners meetings for the calendar years 2020, 2021, 2022, and year-to-date 2023.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED MAR 02 2023

cc: Parties of Record

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