

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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|-------------------------------------|---|------------|
| ELECTRONIC SOUTHERN MADISON WATER |) | |
| DISTRICT UNACCOUNTED-FOR WATER LOSS |) | CASE NO. |
| REDUCTION PLAN, SURCHARGE AND |) | 2023-00070 |
| MONITORING |) | |

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO SOUTHERN MADISON WATER DISTRICT

Southern Madison Water District (Southern Madison District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 11, 2024. The Commission directs Southern Madison 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.

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

For any request to which Southern Madison District fails or refuses to furnish all or part of the requested information, Southern Madison 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 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, Southern Madison District 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 the attachment to Southern Madison District's response to Commission Staff's Second Request for Information (Staff's Second Request) entitled, Independent Contractor Work Performed and Paid Since September 2023. Explain why G.T. Construction, Inc. was hired as the contractor for all of the work evidenced by the invoices provided, and whether any of the work that was performed could have been performed by Southern Madison District personnel.

2. Explain whether there is any ownership, control, interest, other relationship, or contractual agreement between Southern Madison District's Board of Commissioners, including its individual Commissioners, Southern Madison District staff, and G.T. Construction, Inc. to perform this type of work. If so, please provide any documentation evidencing such ownership, control, interest, other relationship, or contractual agreement.

3. Refer to Southern Madison District's response to Staff's Second Request, Item 3.

a. Explain whether the provided amount for "allotment for repairs," of \$253,7883.00, is a typographical error and provide the correct amount allotted for repairs.

b. Explain whether the provided amount in numerical paragraph (2) regarding the line repair at Kenneth Rose Road, of \$14,8880.00, is a typographical error and provide the correct amount estimated for this project.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED SEP 27 2024

cc: Parties of Record

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