COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF HARDIN)CASE NO.COUNTY WATER DISTRICT NO. 2 FOR A)2023-00247GENERAL ADJUSTMENT OF RATES))

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION TO HARDIN COUNTY WATER DISTRICT NO. 2

Hardin County Water District No. 2 (Hardin District No. 2), 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 January 26, 2024. The Commission directs Hardin District No. 2 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.

Hardin District No. 2 shall make timely amendment to any prior response if Hardin District No. 2 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 Hardin District No. 2 fails or refuses to furnish all or part of the requested information, Hardin District No. 2 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, Hardin District No. 2 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 a copy of Hardin District No. 2's system flushing reports for the past five years.

2. Provide a copy of Hardin District No. 2's Board of Commissioner meeting minutes for 2023.

Case No. 2023-00247

-2-

Provide a copy of the informal wage study referred to by Hardin District No.
in response to Commission Staff's First Request for Information (Staff's First Request)
No. 28. Include all workpapers that support the inputs and results of the informal study.

4. Provide a copy of all sources of information that Hardin District No. 2 relied upon to determine the cost of living increases from 2020 through 2023.

5. Provide the flat rate amount of salary adjustment for cost of living provided by Hardin District No. 2 from 2020 through 2023.

6. Provide the number of staff positions that were vacant, filled, and deleted from the employee roster in 2022 and 2023.

7. Provide a copy of all correspondence between Hardin District No. 2 and Hardin County Water District No. 1 (Hardin District No. 1) concerning the establishment of a wholesale rate for Hardin District No. 1, including all documentation that supports the development and justification of the current wholesale rate.

8. Provide a copy of any documentary evidence to support Hardin District No. 2's assertion that BlueOval SK will provide 100 percent of its employees' health benefits.

9. Provide a copy of all documentary evidence regarding the start date of wholesale service to Hardin District No. 1.

10. Provide a copy of any packets or documentation that may have been prepared in advance of Hardin District No. 2's Board of Commissioners' meetings for calendar years 2020 through 2023.

11. Provide a copy of the actuarial study provided by the reinsurance company in order to determine to fixed amount each employee of the district pays per month for

-3-

the Expected Funding Factor.

12. Refer to Hardin District No. 2's response to Staff's First Request, Item 1-h, Exhibit 1-h. Provide an update for the salaries and wages paid to Hardin District No. 2's Commissioners in 2023.

13. Provide Hardin District No. 2's capitalization rate of tap fee labor for the past five years.

14. Provide the amount of Hardin District No. 2's Interest & Dividends Income for 2023.

, id<u>well</u>

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

DATED JAN 16 2024

cc: Parties of Record

*Honorable Damon R Talley Attorney at Law STOLL KEENON OGDEN PLLC 300 West Vine Street Suite 2100 Lexington, KENTUCKY 40507-1801

*Gerald E Wuetcher Attorney at Law STOLL KEENON OGDEN PLLC 300 West Vine Street Suite 2100 Lexington, KENTUCKY 40507-1801

*Mandy Isham Hardin County Water District #2 1951 West Park Road P. O. Box 970 Elizabethtown, KY 42702-0970

*Hardin County Water District #2 1951 West Park Road P. O. Box 970 Elizabethtown, KY 42702-0970

*Shaun Youravich Operations Manager Hardin County Water District #2 1951 West Park Road P. O. Box 970 Elizabethtown, KY 42702-0970

*Vaughn Williams Kenvirons, Inc. 452 Versailles Road Frankfort, KENTUCKY 40602