

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC MOUNTAIN WATER DISTRICT	)	
UNACCOUNTED-FOR WATER LOSS	)	CASE NO.
REDUCTION PLAN, SURCHARGE AND	)	2023-00351
MONITORING	)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO MOUNTAIN WATER DISTRICT

Mountain Water District (Mountain 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 November 21, 2025. The Commission directs Mountain 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.

Mountain District shall make timely amendment to any prior response if Mountain 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 Mountain District fails or refuses to furnish all or part of the requested information, Mountain 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, Mountain 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 bank statement (Deposit Account Report) and the invoices (Backup Documentation) filed as part of the monthly report filing on September 30, 2025. Two checks for \$14,785.60 and \$5,715.00 were withdrawn from the surcharge account, but the only invoice relating to these two checks was one for \$2,580.00 in labor expenses for Nicholas Bailey. Provide all other invoices relating to the remaining \$17,920.60 withdrawn from the account. If no additional invoices are available, explain why.

2. Refer to the Response to Commission Staff's Second² Request for Information, Item 1.

a. Provide any invoices related to the payment of either or both of the two employees added to the leak detection staff.

b. If either of the two employees are being paid with surcharge funds, which are not being tracked through invoices, provide the amounts of those payments.

c. Describe how Mountain District is tracking the expenses related to the two employees.



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

DATED NOV 06 2025

cc: Parties of Record

² Commission Staff issued Second Requests for Information on September 23, 2025, to be responded to by October 10, 2025. Mountain District filed its responses and mislabeled them Response of Mountain District to Staff's Third Request for Information.

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