## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF ROWAN	)	CASE NO.
WATER, INC. FOR FINANCING APPROVAL	)	2024-00015
PURSUANT TO KRS 278.300	)	

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO ROWAN WATER, INC.

Rowan Water, Inc. (Rowan Water), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on February 23, 2024. The Commission directs Rowan Water 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.

Rowan Water shall make timely amendment to any prior response if Rowan Water 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 Rowan Water fails or refuses to furnish all or part of the requested information, Rowan Water 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, Rowan Water 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 Application, Direct Testimony of Jerry Patrick (Patrick Testimony) on page 3. Mr. Patrick stated that "Rowan Water believes that the leasing of its fleet is more economical and saves its customers money on maintenance of vehicles." Provide support and any supporting documents for this statement.
  - 2. Refer to the Patrick Testimony on page 4.

a. Provide the maintenance records that were reviewed by Mr. Patrick and the board of directors for the vehicles that were purchased and owned by Rowan Water.

b. Mr. Patrick stated that when "the comparison was made to the amount of money being spent on the upkeep for the vehicles owned by Rowan Water, and the lease agreements that would include full maintenance, the decision was made to begin leasing vehicles." Provide the comparison analysis that was made by Rowan Water.

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED \_\_FEB 13 2024

cc: Parties of Record

\*L. Allyson Honaker Honaker Law Office, PLLC 1795 Alysheba Way Suite 6202 Lexington, KENTUCKY 40509

\*Brittany H. Koenig Honaker Law Office, PLLC 1795 Alysheba Way Suite 6202 Lexington, KENTUCKY 40509

\*Rowan Water, Inc. 1765 Christy Creek Road Morehead, KY 40351

\*Jerry Patrick Rowan Water, Inc. 1765 Christy Creek Road Morehead, KY 40351