## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

I	ln	th	10	M	latter	Of:

ELECTRONIC APPLICATION OF BUTLER	)	CASE NO.
COUNTY WATER SYSTEM, INC. FOR A RATE	)	2024-00061
ADJUSTMENT PURSUANT TO 807 KAR 5:076	)	

## COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO BUTLER COUNTY WATER SYSTEM, INC.

Butler County Water System, Inc. (Butler County 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 June 3, 2024. The Commission directs Butler County 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.

Butler County Water shall make timely amendment to any prior response if Butler County 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 Butler County Water fails or refuses to furnish all or part of the requested information, Butler County 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, Butler County 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 Butler County Water's response to Commission Staff's First Request for Information (Staff's First Request), Item 15a, Attachment 15\_a\_Nonrecuring\_charges\_cost\_justifications.pdf. Reconcile and explain the difference between the total proposed non-recurring charge and the tariff amount for each of the following charges:
  - a. Returned Check Fee;

- b. Delinquent Service Fee;
- c. Meter Reading Recheck Fee;
- d. Service Connection Fee;
- e. Service Connection- After Hours Fee:
- f. Service Investigation Fee;
- g. Service Investigation After Hours Fee;
- h. Service Line Inspection Fee;
- i. Meter Test Request Fee; and
- j. Meter Investigation Fee.
- 2. Refer to Butler County Water's response to Staff's First Request, Item 8, Attachment, 8\_Minutes\_2024.pdf. Explain what Butler County Water's plans are for line extensions. Explain what types of funding Butler County Water is currently seeking for this project and any funding approved. Provide any documentation related to approvals for funding.
- 3. Provide the monthly unaccounted for water loss calculations for calendar years 2023 and 2024.
- Refer to Application, Exhibit 4, 4\_SAO\_With\_Attachments.pdf, Reference
   G.
- a. Explain what steps Butler County Water plans to take to reduce water loss from the reported 21.758 percent to at no more than 15 percent.
- b. Explain what areas Butler County Water has identified in contributing to its water loss.

- 5. Refer to 807 KAR 5:076 Section 5(1)(a). State whether Butler County Water posted, at its place of business, a copy of the notice no later than the date the application was submitted to the Commission. If not, explain why not.
- 6. Refer to 807 KAR 5:076 Section (5)(1)(b)(1) and (2). State whether Butler County Water, within five business days of the date of the application was submitted to the Commission, posted on its website a copy of the public notice and a hyperlink to the location on the Commission's website where the case documents are available. If yes, submit any proof of notice on the website with instructions on where to locate said publication. If not, explain why not.
- 7. Refer to 807 KAR 5:076 Section (5)(3). Provide the tear sheets showing the legal notice advertisement and any other documentation reflecting notice.
- 8. Provide a copy of the most recent invoice for Medical and Dental insurance Warren County Water District provides to employees.
- 9. Refer to Butler County Water's response to Staff's First Request, Item 6a, Cell H17. Explain the reason \$885 has been added to the regular salaries amount for only this employee.
- 10. Refer to Butler County Water's response to Staff's First Request, Item 5, 5\_Butler\_County\_Rate\_Model.xlsx, Pension & Benefit Tab, Row 68. Provide a breakdown and explanation of all post-employment benefits (OPEB) Butler County Water provides employees.
- 11. Refer to Butler County Water's Current Tariff and Butler County Water's response to Staff's First Request, Item 15, Attachment 15\_Nonrecurring\_Charges. Confirm whether the Delinquent Service to Reconnect and Delinquent Service to

Reconnect After Hours charges are components of the Delinquent Service charge. If so, explain why Butler County Water separated the charges. If not, explain why they are listed as separate nonrecurring charges considering they are not listed in Butler County Water's current tariff.

12. Refer to Butler County Water's response Commission Staff's First Request for Information, Item 20. Confirm if Butler County Water's disposal of failed meters is a recurring event expected to recur annually or an unusual occurrence.

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED MAY 20 2024

cc: Parties of Record

\*Robert K. Miller Straightline Kentucky LLC 113 North Birchwood Ave. Louisville, KENTUCKY 40206

\*Jacob Cuarta Butler County Water System, Inc. P. O. Box 10180 Bowling Green, KY 42102

\*Butler County Water System, Inc. 1118 S Main Street, Suite 1 Morgantown, KY 42261

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