

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF MOREHEAD)	
UTILITY PLANT BOARD TO REVISE ITS)	
WHOLESALE WATER RATES TO AND ENTER)	CASE NO.
INTO REVISED WATER PURCHASE)	2024-00193
AGREEMENTS WITH BATH COUNTY WATER)	
DISTRICT AND ROWAN WATER, INC.)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO MOREHEAD UTILITY PLANT BOARD

Morehead Utility Plant Board (Morehead), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on August 29, 2024. The Commission directs Morehead 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.

Morehead shall make timely amendment to any prior response if Morehead 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 Morehead fails or refuses to furnish all or part of the requested information, Morehead 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, Morehead 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 Morehead's response to Commission Staff's First Request for Information (Staff's First Request), Item 4, Attachments 4a and 4b.

a. Both Attachments reference a July 1, 2024, wholesale rate of \$2.34. However, the Commission-approved rate effective July 1, 2024, was \$2.284 per 1,000 gallons. Explain the discrepancy between the July 1, 2024, rate referenced in the Attachments and the rate approved by the Commission effective July 1, 2024.

b. If the capital charges were scheduled to be removed January 2024, explain why these charges continued for an additional six months.

c. Confirm that Morehead would be charging Bath County Water District and Rowan Water, Inc., a higher rate than approved by the Commission for the months that Morehead uses the capital charge and depreciation reserve credits to offset the increased water cost.

2. Refer to Morehead's responses to Staff's First Request, Items 1b and 5. Both responses refer to grant funding that was approved after the Wholesale Water Rate Study Report was written. Response 5 states "after the new grants are factored into the cost-of-service study along with actual full year operational costs, we expect the maximum \$4.74 rate to be reduced considerably . . ." Provide a calculation of the reduction impact of the grant funding on the calculated \$4.74 rate.



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

DATED AUG 15 2024

cc: Parties of Record

*Attorney Earl Rogers III
Campbell Rogers & Hill, PLLC
Campbell & Rogers
154 Flemingsburg Road
Morehead, KENTUCKY 40351

*Morehead Utility Plant Board
135 S Wilson Avenue
Morehead, KY 40351