

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF WEBSTER)	
COUNTY WATER DISTRICT FOR AN)	CASE NO.
ALTERNATIVE RATE FILING PURSUANT TO 807)	2024-00199
KAR 5:076)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO WEBSTER COUNTY WATER DISTRICT

Webster County Water District (Webster 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 April 24, 2025. The Commission directs Webster 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.

Webster District shall make timely amendment to any prior response if Webster 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 Webster District fails or refuses to furnish all or part of the requested information, Webster 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, Webster 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 Webster District's response to Commission Staff's First Request for Information (Staff's First Request), Item 3, Rate Model Excel Document, Wages Tab.

a. State whether standard full-time regular hours are 1,950 or 2,080, or some other number and provide an explanation.

b. Refer to position 8 with regular hours of 1,346.10. State whether this position is considered full or part-time.

2. Refer to Webster District's response to Staff's First Request Item 4, Employee Payroll 2023 and 2024.

a. Explain why there are employees with hire dates in 2024 in the 2023 Employee Payroll Document.

b. State the current total planned full-time employee(s) at full staffing. If this number is different from the test period, please identify if any positions are currently vacant.

c. State the current total planned part-time employee(s) at full staffing. If this number is different from the test period, please identify if any positions are currently vacant.

3. Refer to the Application, Schedule of Adjusted Operations and April 8, 2025 supplemental response to Staff's First Request, Item 1c, Cross Reference. In Webster District's Cross Reference document, it indicated a Materials and Supplies expense of \$235,290 while the application reported an expense of \$201,513. Provide an explanation for what is included in the \$201,513 amount and provide calculations that support that amount.

4. Provide a copy of Webster District's 2023 audit. If the 2023 audit is not available, state when it will be complete and the reasons for the delay.

5. Refer to Webster District's response to Staff's First Request, Item 1a, General Ledger 2023, Account 00620-0003, Sup-treat-oper. Refer to the chart below and provide the following for each item.

Date	Description	Amount
2/8/2023	CITCO 32597 Grundfos pump @ plant APVCH 030123	4,775.81
4/12/2023	watersolu 32910 analyzer and overflow	3,275.00
4/18/2023	clark ele 32761 2500amp breaker repairs	12,500.00
4/18/2023	clark ele 32762 Plant main breaker clear	3,194.00
5/31/2023	PACE 32893 BACT'S FLOURIDES WT	4,806.10

- a. Provide a copy of the invoice for each item in the chart above.
- b. Describe each purchase and state whether each item should have been capitalized.
- c. If Webster District believes its classification as an expense is proper, explain the reasoning.
- d. If an item should have been capitalized, identify that item and provide the appropriate NARUC depreciation life for it.

6. Refer to Webster District's response to Staff's First Request, Item 1a, General Ledger 2023, Account 00620-0005, Sup-t & D-oper. Refer to the chart below and provide the following for the item.

Date	Description	Amount
6/26/2023	ewm 32971 Choice Clark Rd-directional	7,586.75

- a. Provide a copy of the invoice.
- b. Describe the purchase and state whether the item should have been capitalized.
- c. If Webster District believes the item's classification as an expense is proper, explain the reasoning.
- d. If the item should have been capitalized, provide the appropriate NARUC depreciation life for it.

7. Provide proof of customer notice pursuant to 807 KAR 5:076, Section 5(3).
8. Refer to Crittenden-Livingston Water District and Webster District's Interconnect Agreement, filed March 10, 2011. Refer also to Crittenden-Livingston Water District and Webster District's current tariffs on file with the Commission.
 - a. Explain why there is a discrepancy between the contracted interconnection rate and the wholesale rates in the respective current tariffs on file with the Commission.
 - b. State whether there have been discussions of the interconnection rate changing since the contract was signed and provide a summary and timeline of those discussions.



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

DATED APR 10 2025

cc: Parties of Record

*Ariel Baker
Kentucky Rural Water Association
Post Office Box 1424
1151 Old Porter Pike
Bowling Green, KY 42102-1424

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

*Trevor Baldwin
Superintendent
Webster County Water District
P. O. Box 320
Dixon, KY 42409-0320

*Webster County Water District
478 US HWY 41-A South
P. O. Box 320
Dixon, KY 42409-0320