

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF WARREN)	
COUNTY WATER DISTRICT FOR AN)	CASE NO.
ADJUSTMENT OF RATES FOR WATER)	2024-00200
SERVICE)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO WARREN COUNTY WATER DISTRICT

Warren County Water District (Warren 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 December 13, 2024. The Commission directs Warren 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.

Warren District shall make timely amendment to any prior response if Warren 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 Warren District fails or refuses to furnish all or part of the requested information, Warren 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, Warren 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 Application, Exhibit 8, Statement of Adjusted Operations and Revenue Requirement calculation.

a. Explain why Miscellaneous Non-Utility Income was included as part of Total Operating and Maintenance Expenses.

b. Explain why Unrealized (Gain)/Loss on Investments was included as part of Total Operating and Maintenance Expenses.

c. Explain why Rate Case Expense was not included as part of Total Operation and Maintenance Expenses.

2. Refer to the Application, Exhibit 12, Reference E, at pages 3 and 4. Confirm that all projects under the development of hydrants or mains have been completed. If not, explain the current status of each project.

3. Refer to Warren District's response to Commission Staff's Second Request for Information, Item 2, 03_Exhibit_2-2_Known_and_Measureables.xlsx:

a. Transpark 2 Tank Tab, cell A3. Confirm the tank is now in service, if not, provide the projection in service date for the tank.

b. SCADA Completion Date Tab. Confirm the completion status of the SCADA upgrade project. If not, provide the expected date.

c. CIS Infinity Upgrade Tab. Confirm the completion status of the Billing software upgrade. If not, provide the expected completion date.

4. Refer to Warren District's response to Commission Staff's First Request for Information (Staff's First Request), Item 1, Attachment 1-1C at 79. Confirm that the scholarship fund is not included in the revenue requirement. If it is, explain why it was included.

5. Refer to Warren District's response to Staff's First Request, Item 1, Attachment 1-1C at 20. Provide a copy of any updated Employee Policy Manual(s).

6. Refer to Warren District's response to Staff's First Request, Item 1, Attachment 1-1C at 42. Explain what the error was for the lawsuit served on Mr. Cuarta.

7. Refer to Warren District's response to Staff's First Request, Item 1, Attachment 1-1C at 27.

a. Provide a copy of any contracts or agreements that Warren District has with Charter Communications involving fiber installation.

b. State whether the fiber optic lines are being installed on the outside of water lines or within the water lines.

c. State whether Warren District employees working online locates for fiber optics are being paid by Warren District or by Charter Communications through an agreement.

d. Provide a list of any expenses that Warren District has incurred related to the installation of fiber optics.

8. Refer to Warren District's response to Staff's First Request, Item 1, Attachment 1-1C at 73 and Application, Exhibit 15, Depreciation Schedule.

a. Explain what types of surplus items were disposed of from inventory. Provide a list of surplus items that reached the end of their useful life and were disposed of if not included in the capital asset or depreciation schedule.

b. Provide the total of all surplus items that were disposed of from inventory during the test year.

c. Explain what the current procedures are, including monetary thresholds, related to Warren District's purchase and disposal of surplus items.

9. Refer to Warren District's response to Staff's First Request, Item 1, Attachment 1-1C at 79, regarding partial reimbursement of damages.

a. Explain whether payment by Warren District for this type of damage is supported by its tariff.

b. Reconcile this reimbursement with Tariff Sheet PSC Ky. No. 12, Sheet No. 2 (issued September 12, 2013), effective October 17, 2013, that stated any maintenance and repair of facilities beyond Warren District's delivery point is the responsibility of the customer.

10. Refer to Warren District's response to Staff's First Request, Item 1, Attachment 1-1C at 75.

a. Explain what project Warren District is referring to and whether or not a Certificate of Public Convenience and Necessity (CPCN) was sought.

(1) If so, provide the Case Number.

(2) If not, explain why a CPCN was not required.

b. Provide the total project cost.

c. Explain the funding shortfall and what actions have been taken to cure the shortfall.

11. Refer to Warren District's response to Staff's First Request, Item 4, 2023 General Ledger, Account 620-6002-2, Matl & Supply – T & D (Maint).

a. Provide copies of each invoice listed below Item 9(d).

b. Refer to the chart listed below Item 9(d). Describe each purchase and state whether each item should have been capitalized.

c. Refer to the chart listed below Item 9(d). If Warren District believes its classification as an expense is proper, explain the reasoning.

d. Refer to the chart listed below Item 9(d). If an item should have been capitalized, provide the appropriate NARUC depreciation life for it.

Date	Description	Amount
6/20/2023	CORE & MAIN LP /IN: S895712	\$ 7,948.44
6/30/2023	FORTILINE INC /IN: 6104284A	5,069.00
7/31/2023	FORTILINE INC /IN: 6106310	3,245.00
9/25/2023	TRACER ELECTRONICS LLC. /IN: 140005	3,604.45
12/31/2023	CORE & MAIN LP /IN: U085188	4,020.32

12. Refer to Warren District's response to Staff's First Request, Item 4, 2023 General Ledger, Account 635-6002-2, Contract Other – T & D (Maint).

- a. Provide copies of each invoice listed below Item 10(d).
- b. Refer to the chart listed below for Item 10(d). Describe each purchase and state whether each item should have been capitalized.
- c. Refer to the chart listed below for Item 10(d). If Warren District believes its classification as an expense is proper, explain the reasoning.
- d. Refer to the chart listed below for Item 10(d). If an item should have been capitalized, provide the appropriate NARUC depreciation life for it.

Date	Description	Amount
11/30/2023	NEAT BROTHERS BORING LLC /IN: 11/22/23 DUG METERS	\$ 9,100.00
11/30/2023	NEAT BROTHERS BORING LLC /IN: 11/30/23 DUG METERS	11,960.00
12/12/2023	NEAT BROTHERS BORING LLC /IN: 12/08/2023 SHEET 10	6,240.00
12/12/2023	NEAT BROTHERS BORING LLC /IN: 12/08/2023 SHEET 11	6,500.00
12/12/2023	NEAT BROTHERS BORING LLC /IN: 12/08/2023 SHEET 9	6,500.00

13. Refer to Warren District's response to Staff's First Request, Item 4, 2023 General Ledger, Account 635-8001-2, Contract Other – Admin & Genl.

- a. Explain the business purposes for the restaurant and hotel expenses reported in the account.
- b. Explain the business purpose for each item listed in the chart below

Date	Description	Amount
1/10/2023	BOWLING GREEN ROTARY CLUB INC. /IN: 01/01/2023	\$ 225.00
1/11/2023	UNITED WAY OF SOUTHERN KY INC /IN: 3498	500.00
1/17/2023	BA OF SOUTH CENTRAL KY /IN: MD8170	455.00
1/25/2023	BOWLING GREEN PARKS AND RECREATION /IN: 01/25/2023	347.40
1/31/2023	NRECA CAREER CENTER /IN: OM 3998501	275.00
2/28/2023	AMERICAN RED CROSS /IN: OM O-0014168359	576.00
2/28/2023	AMERICAN RED CROSS /IN: OM O-0014168390	936.00
3/31/2023	GLORY BABY MINISTRY INC. /IN: OM 40314	360.02
4/18/2023	BOWLING GREEN ROTARY CLUB INC. /IN: 04/01/2023	225.00
4/30/2023	NRECA CAREER CENTER /IN: OM 4048746	275.00
5/16/2023	COLLEGE HEIGHTS FOUNDATION /IN: 05/09/2023	2,000.00
5/31/2023	YOURMEMBERSHIP-CAREERS /IN: OM R63178944	299.00
6/30/2023	BA OF SOUTH CENTRAL KY /IN: MI388	2,663.40
6/30/2023	YOURMEMBERSHIP-CAREERS /IN: OM R63496872	255.76
6/30/2023	ACTS NOW INC. /IN: OM QTNH8SNJNCM	250.00
7/12/2023	BOWLING GREEN ROTARY CLUB INC. /IN: 07/01/2023	225.00
7/31/2023	DOWN SYNDROME OF SOUTH CENTRAL KY /IN: OM 34752G	500.00
10/12/2023	BOWLING GREEN ROTARY CLUB INC. /IN: 10/01/2023	225.00

14. Refer to Warren District's motion to proceed without a hearing. State whether Warren District continues to waive its right to a formal hearing in this matter.

Linda C. Bridwell, PE
 Executive Director
 Public Service Commission
 P.O. Box 615
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DATED NOV 26 2024

cc: Parties of Record

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