

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO THE)	CASE NO.
FINANCIAL AND OPERATING CAPACITY OF)	2024-00325
MORGAN COUNTY WATER DISTRICT)	

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

Morgan County Water District (Morgan 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 4, 2025. The Commission directs Morgan 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.

Morgan District shall make timely amendment to any prior response if Morgan 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 Morgan District fails or refuses to furnish all or part of the requested information, Morgan 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, Morgan 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 Morgan District's response to Commission Staff's First Request for Information (Staff's First Request), Item 7b.

a. Explain whether Morgan District has contacted any of the unpaid vendors to work out a specific payment plan.

b. Explain what services each vendor originally provided to Morgan District.

c. Provide when Morgan District expects to receive an update regarding the status of its water grant application.

d. Identify and explain the categories of customers, revenues or expenses that Morgan District classifies as a “customer acct.”

2. Refer to Case No. 2024-00010, Morgan District’s response to Staff’s Second Request for Information, Item 4.²

a. Explain how Morgan District increased its unpaid supplier invoices by \$200,000 from April 30, 2024, to January 28, 2025.

b. Provide an updated list of vendors Morgan District has outstanding balances with and specify which of these vendors Morgan District currently utilizes. Consider this an ongoing monthly request.

3. Refer to Morgan District’s response to Staff’s First Request, Item 9. State when Morgan District anticipates this review process to be complete.

4. Refer to Morgan District’s response to Staff’s First Request, Item 13. Explain the advantages the AmpStun Utility Billing system provides Morgan District as compared to the previous United Systems and how this will improve efficiency for Morgan District.

5. Refer to Morgan District’s response to Staff’s First Request, Item 14, Attachment pages 2–3.

a. Provide what amount, if any, Morgan District still owes to the Internal Revenue Service (IRS) and the associated period the amount was incurred.

² Case No. 2024-00010, *Electronic Application of Morgan County Water District for a Rate Adjustment Pursuant to 807 KAR 5:076* (filed May 24, 2024), Morgan District Response to Staff’s Second Request, Item 4.

b. Identify the number of notices received and provide copies of any notice Morgan District has received regarding overdue taxes following March 31, 2024.

c. Explain whether Morgan District has a plan to timely file its 2024 taxes and make any necessary payments to the IRS.

6. Refer to Morgan District's response to Staff's First Request, Item 14, Attachment at 12. Explain whether payment of this invoice means that Morgan District is now current with Champion Industries, Inc.

7. Refer to Morgan District's response to Staff's First Request, Item 14, Attachment 2 at 79.

a. Explain whether Morgan District maintains this information via electronic means. If so, provide the electronic version. If not, explain why not.

b. Explain what the check payment and deposit register sheets are tracking and what the purpose is.

8. Refer to Morgan District's response to Staff's First Request, Item 18. Provide when Morgan District plans to file the required records.

9. Refer to Case No 2021-00206³ and the Commission's June 29, 2023 Order. Explain whether Morgan District plans to seek a water loss surcharge in the future. If not, explain why not.

10. Refer to Morgan District's response to Commission Order, filed January 13, 2025. Specifically, Morgan District and John Coffey's response paragraph 3 and Exhibit A.

³ Case No. 2021-00206, *Electronic Morgan County Water District's Unaccounted for Water Loss Reduction Plan, Surcharge and Monitoring*.

- a. Explain how this project will help Morgan District's efforts to reduce water loss.
- b. Explain what additional steps Morgan District is taking to reduce its water loss.

 AP

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

DATED MAR 19 2025

cc: Parties of Record

Chris Adams
1009 Hwy 172
West Liberty, KENTUCKY 41472

*John Coffey
General Manager
Morgan County Water District
1009 Hwy 172
West Liberty, KY 41472

Patty Cordeiro
1009 Hwy 172
West Liberty, KENTUCKY 41472

Ellen Motley
1009 Hwy 172
West Liberty, KENTUCKY 41472

*Morgan County Water District
1009 Hwy 172
West Liberty, KY 41472

*L. Allyson Honaker
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KENTUCKY 40509

*Heather Temple
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KENTUCKY 40509

*Jim Gazay
Morgan County Judge Executive
450 Prestonsburg Street
West Liberty, KENTUCKY 41472