

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO WOOD)	
CREEK WATER DISTRICT'S TERMINATION OF)	CASE NO.
WHOLESALE WATER SERVICE TO THE CITY)	2024-00359
OF LIVINGSTON FOR NONPAYMENT OF BILLS)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO WOOD CREEK WATER DISTRICT

Wood Creek Water District (Wood Creek 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 20, 2024. The Commission directs Wood Creek 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.

Wood Creek District shall make timely amendment to any prior response if Wood Creek 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 Wood Creek District fails or refuses to furnish all or part of the requested information, Wood Creek 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, Wood Creek 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. State if, and when, notice was sent to the city of Livingston (Livingston) regarding termination of water service on November 5, 2024.

2. Provide copies of any notices sent to Livingston regarding the termination of service on November 5, 2024.

3. Identify any other entities that were notified prior to the termination of service to Livingston on November 5, 2024. Provide how they were notified, when they

were notified, who was contacted, and who with the Wood Creek Water District initiated the communications.

4. State how long Livingston has had an outstanding balance with Wood Creek Water District.

5. State where in the Wood Creek District 2022 or 2023 audits filed with the Public Service Commission, any outstanding accounts receivable from Livingston is included.

6. State why Wood Creek District had not terminated service prior to the most recent termination.

7. Provide copies of minutes for all board meetings between December 2021 and November 2024 in which service to or payment from Livingston was discussed.

8. Provide the Monthly billing and payment history between Wood Creek District and Livingston from December 2021 through November 2024. Separate the billing amounts between water sold and other services provided.

9. Provide a monthly balance due to Wood Creek District from Livingston from December 2021 through November 2024.

10. Provide the current balance and the current arrearage, if any, owned by Livingston to Wood Creek District.

11. Provide any written payment plans or agreements between Wood Creek District and Livingston between December 2021 through November 2024.

12. Identify and provide a copy of any Wood Creek District procedures relevant to the termination of service to Livingston.

13. Provide a copy of any contracts between Wood Creek District and Livingston.

14. State what services, and under what terms, Wood Creek District has provided or provides to Livingston.

15. Provide any correspondence between Wood Creek District and Livingston between December 2021 through November 2024, including but not limited to copies of emails or letters.

16. Referring to the December 2, 2024 filing made by Wood Creek state what Wood Creek District considers “good faith” payments.

17. State whether it is Wood Creek District’s intention to terminate water service on or around December 25, 2024, if the \$57,000 payment has not been made.

18. Identify the entity that owns the meter between the Wood Creek Water District and Livingston. State how often the meter is tested. Provide the last meter test results.

19. State if Wood Creek District has any customers that are not residential customer to which it provides water service that have failed to make full payment on the account after more than 30 days from December 2021 through November 2024. If so, state how many customers, the duration of the outstanding balance, and how Wood Creek District determines whether or not termination should occur. Identify the balance of each of those customers.

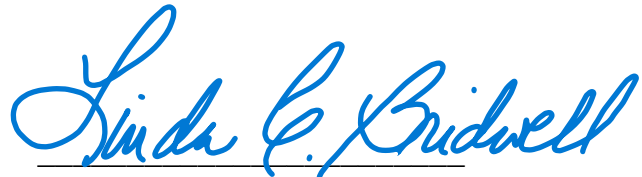
20. Provide any correspondence between Kentucky American Water and Wood Creek District between December 2021 through November 2024, including but not limited to copies of emails or letters.

21. State how many notices of termination Wood Creek District has provided to Livingston between December 2021 and November 2024.

22. State how many times Livingston's water service been terminated for non-payment since Wood Creek District began selling water to Livingston.

23. Identify any communications between representatives of Wood Creek District and any other party concerning any other entity operating the water or wastewater systems owned by Livingston. Identify when the communications took place, everyone involved and who they represented, and what the nature of the communications was.

24. Provide copies of all procedures for termination of water service for any customer class adopted by Wood Creek District.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED DEC 05 2024

cc: Parties of Record

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