

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MUHLENBERG )	CASE NO.
COUNTY WATER DISTRICT FOR A RATE )	2024-00404
ADJUSTMENT PURSUANT TO 807 KAR 5:076 )	

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

Muhlenberg County Water District (Muhlenberg 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 10, 2025. The Commission directs Muhlenberg District to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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.

Muhlenberg District shall make timely amendment to any prior response if Muhlenberg 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 Muhlenberg District fails or refuses to furnish all or part of the requested information, Muhlenberg 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, Muhlenberg 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 Muhlenberg District's response to Commission Staff's First Request for Information (Staff's First Request), Item 1b, 1b\_Trial\_Balance\_2023.xlsx, Column G, entitled "Annotation." Provide explanations for the annotations.

2. Refer to Muhlenberg District's response to Staff's First Request, Item 6, 6\_Employee\_Hours\_Wages\_and\_Benefits.xlsx.

a. Refer to Column F. Provide an explanation for employee compensation categorized in the “Bonus Pay” column, including board minutes approving the benefit, how eligibility is determined and how compensation is calculated. Also, provide a copy of any written utility policy explaining the bonus.

b. Refer to Column G. Provide an explanation for the Christmas Bonus Pay, including board minutes approving the benefit, how eligibility is determined and how compensation it is calculated. Also, provide a copy of any written utility policy explaining the Christmas Bonus.

c. Refer to Column I. Provide an explanation for the On Call Pay, including how eligibility is determined and how compensation is calculated. Also provide a copy of any written policy explaining the On Call Pay.

d. Refer to Column K, Sample Testing. Provide an explanation for the Sample Testing Pay, including board minutes approving how eligibility is determined and how compensation is calculated. Provide a copy of any written job duty description or utility policy explaining the Sample Testing program.

3. Refer to Muhlenberg District’s response to Staff’s First Request, Item 6.

a. Using a table format, provide an updated Excel spreadsheet with all formulas, rows, and columns fully accessible and unprotected that lists each position’s (Position 1, Position 2, etc.) job titles and pay rates of each employee currently working for Muhlenberg District as of the time of this request.

b. If a position is recently vacated but the intent is to fill it, note the vacancy and the amount of time that is has been vacant and if there is a timeframe the vacancy is expected to be filled.

c. Provide an employee count that Muhlenberg District considers fully staffed.

4. Refer to the Application, Attachment 4, References, Adjustment I. Also Refer to Muhlenberg District's response to Staff's First Request, Item 8, 8\_Billing\_Software.pdf. Also, refer to Muhlenberg District's response to Staff's First Request, Item 1d, 1d\_Rate\_Study.xlsx, Software Upgrade tab. In response to Commission Staff's request for a copy of the invoices for the billing software upgrades, Muhlenberg District submitted several invoices totaling \$60,552.

a. Confirm that all the invoices provided are included in the cost for the billing software upgrade. If so, identify the expense classification they are assigned to in the table provided in response item 1d, as shown below. If not confirmed, provide a list of invoices that only concern the upgrade, identifying the billing software upgrade purchases.

<u>Expense Classification</u>	<u>Initial Outlay</u>	<u>Annual Outlay</u>
Customer Web Portal	\$ 2,995	\$ 2,795
SQL Server License	1,125	1,315
Remote Setup and Training	4,000	
Card Readers	1,425	
Server	10,765	
Alliance G5 Migration and Training	21,365	
Onboarding Services		9,000
	<u>41,675</u>	<u>13,110</u>
Amortized over Five Years	5	
Annual Cost	<u>\$ 8,335</u>	<u>\$ 13,110</u>

b. Confirm that all the expenses submitted in response to Item 8 invoices are for the billing software upgrade project.

c. Provide a copy of the contract or signed agreement addressing the \$13,110 annual maintenance fee.

5. Provide the minutes from Muhlenberg District's Board of Commissioners' (Board) meetings for the calendar years 2023 and 2024.

a. Designate each action that authorizes hiring.

b. Designate each action that authorizes adjustments to wage rates and any other compensation or fringe benefit actions.

9. Refer to Muhlenberg District's response to Staff's First Request, Item 26. The response is unresponsive. Provide updated cost justification sheets to support each nonrecurring charge listed in Muhlenberg District's tariff, even if Muhlenberg District does not wish to revise the charges.

10. Refer to Muhlenberg District's response to Staff's First Request, Item 27. Muhlenberg District did not provide the requested information. Provide updated cost justification sheets to support each Meter Connection/Tap-on Charge listed in Muhlenberg District's tariff.

11. Refer to Muhlenberg District's response to Staff's First Request, Item 14, 14\_Commissioners.pdf and Item 16, 15\_Training\_Records.pdf.

a. Confirm that Wade Mathis was originally appointed on June 29, 2023. If not confirmed, explain when he was appointed and provide the fiscal court minutes to support the response.

b. Provide the total number, filled and unfilled, of Muhlenberg District board of commissioner positions.

c. Provide the number of Muhlenberg District board of commissioner positions that are currently filled.

d. If any Muhlenberg District board of commissioner positions are unfilled, explain when Muhlenberg District anticipates those positions to be filled.

e. If any Muhlenberg District board of commissioner positions are unfilled, provide the resignation or term completion date of last board member to vacate a position.

 *Linda C. Bridwell* PE

Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED MAR 21 2025

cc: Parties of Record

Case No. 2024-00404

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