

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF SIMPSON)	CASE NO.
COUNTY WATER DISTRICT FOR A RATE)	2024-00068
ADJUSTMENT PURSUANT TO 807 KAR 5:076)	

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

Simpson County Water District (Simpson 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 June 6, 2024. The Commission directs Simpson 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.

Simpson District shall make timely amendment to any prior response if Simpson 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 Simpson District fails or refuses to furnish all or part of the requested information, Simpson 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, Simpson 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, Attachment 4, 4_SAO_With_Attachments.pdf, References, Adjustment C. Using a table format, provide an Excel spreadsheet with all formulas, rows, and columns fully accessible and unprotected that lists each position (Position 1, Position 2, etc.) job title, hours worked, pay rate, total wages paid, and total FICA cost for each employee for the years ended December 31, 2022, and 2023. Include the date the employee was hired and, if applicable, the employee's termination date. The

table should include a column for total wages by employee (regular wages and overtime) and a row for total wages for all employees. Employee names should be redacted from all documents.

a. Provide calculations by employee that support pro forma wages of \$281,272. This may be provided as a separate table or combined with the table above. If a position is recently vacated but the intent is to fill it, note the vacancy and the amount of time that it has been vacant.

b. Provide a summary of overtime hours worked and costs that were due to vacant positions and thus will be eliminated when the vacant positions are filled.

2. Refer to Simpson District's response to Commission Staff's First Request for Information (Staff's First Request), Item 9(b).

a. State whether Stephen Snider has ever attended water commissioner training.

b. State whether Larry Gomer has attended any water commissioner trainings other than July 11-23, 2023. If so, provide the dates of the training and whether that training was approved by the Public Service Commission.

c. State whether Corey Konow has attended any water commissioner trainings other than March 19-20, 2024. If so, provide the dates of the training and whether that training was approved by the Public Service commission.

3. Refer to Simpson District's response to Staff's First Request, Item 9(a). Provide fiscal court minutes for Larry Gomer, Corey Konow, and Stephen Snider's initial appointments.

4. Refer to Simpson District's response to Staff's First Request, Item 9(a).

- a. State the date when Raymond Mann completed his term.
- b. State the date when Joseph Richards completed his term.

5. Refer to the Application, Exhibit 4, Attachment 4_SAO_With_Attachments.pdf. Explain how Simpson District determined to decrease the useful lives of the Badger 5/8-Inch AMR meters from 20 years to 10 years. Provide any studies or reports that form the basis of this decision.

- a. Explain how Simpson District proposes to recover the undepreciated balance for the Badger 5/8-Inch AMR meters.

- b. With the proposed change in depreciated useful life from 20 years to 10 years, provide the number of meters now past the end of the useful life, or will reach it within the next year or two.

- c. Explain and provide Simpson District's proposed long term plan regarding meter infrastructure.

6. Refer to Simpson District's response to Staff's First Request, Item 15a, Attachment 15a_Nonrecurring_Charges_Justification.pdf. Reconcile and explain the difference between the total non-recurring charge expense and the tariff charge for the following charges:

- a. Returned Check Fee;
- b. Delinquent Service Fee;
- c. Meter Reading Recheck Fee;
- d. Service Connection Fee;
- e. Service Connection - After Hours;
- f. Service Investigation Fee;

- g. Service Investigation - After Hours Fee;
- h. Service Line Inspection Charge Fee;
- i. Meter Test Request Fee; and
- j. Meter Investigation Fee.

7. Refer to 807 KAR 5:076 Section 5(1)(a). State whether Simpson District posted, at its place of business, a copy of the notice no later than the date the application was submitted to the Commission. If not, explain why not.

8. Refer to 807 KAR 5:076 Section (5)(1)(b)(1) and (2). State whether Simpson District, within five business days of the date of the application was submitted to the Commission, posted on its website a copy of the public notice and a hyperlink to the location on the Commission's website where the case documents are available. If yes, submit any proof of notice on the website with instructions on where to locate said publication. If not, explain why not.

9. Refer to 807 KAR 5:076 Section (5)(3). Provide the tear sheets showing the legal notice advertisement and any other documentation reflecting notice.

10. Provide a copy of the most recent invoice for Medical and Dental insurance Warren County Water District provides to employees.

11. Provide the monthly unaccounted for water loss calculations for calendar years 2023 and 2024. If water loss is above 15 percent, explain what areas Simpson Water has identified in contributing to water loss and plans to reduce water loss.

12. Refer to Simpson District's response to Staff's First Request Item 8, Attachment 8_Minutes_2023, at 2, paragraph 2.

a. State whether the grant funding represents the entirety of the project or if additional funding sources are required. If additional sources are required, provide each source, the amount, and the estimated approval date.

b. State when the project is expected to be started and completed.

c. State if Simpson District sought Commission approval for the water line replacement projects. If yes, provide the case number in which it was authorized.

d. Provide copy of the executed agreement with Kentucky Infrastructure Authority for the grant referenced in the August 25, 2023 minutes.

13. Refer to Simpson District's response Staff's First Request, Item 19. Explain if Simpson District's disposal of failed meters is a recurring event expected to recur annually or an unusual occurrence.

14. Refer to Simpson District's Current Tariff and Simpson District's response to Staff's First Request, Item 15, Attachment 15_Nonrecurring_Charges. Confirm whether the Delinquent Service to Reconnect and Delinquent Service to Reconnect - After Hours charges are components of the Delinquent Service charge. If so, explain why Simpson District separated the charges. If not, explain why they are listed as separate nonrecurring charges considering they are not listed in Simpson District's current tariff.



Linda C. Bridwell, PE
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Public Service Commission
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DATED MAY 20 2024

cc: Parties of Record

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