

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 THIRD 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 23, 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 Second Request for Information (Staff's Second Request), Item 4. Explain what reports Morgan District can run with its new billing software, in addition to water loss reports.

2. Refer to Morgan District's response to Staff's Second Request, Item 5c. Explain whether Morgan District timely filed its 2024 tax returns.

3. Refer to Morgan District's response to Staff's Second Request, Item 5b Attachment.

a. Provide any notices or other communications received from the Department of Treasury, Internal Revenue Service (IRS) regarding the assessment of additional taxes, interest, or penalties relevant to the notice dated March 24, 2025, for the tax period ending June 30, 2024.

b. If the IRS does not accept this agreement, provide how much Morgan District would owe the IRS.

4. Refer to Morgan District's response to Staff's Second Request, Item 7a, Attachment, page 11 of 15.

a. Explain whether Morgan District has a loan agreement with Bank of the Mountains. If not, explain the purpose of the payments to Bank of the Mountains.

b. Provide any documentation about the Bank of the Mountain payments, including any loan agreements.

5. Refer to Morgan District's response to Staff's Second Request, Item 9 relating to steps taken to improve its water loss percentage.

a. Provide Morgan District's average water loss for the year 2024.

b. Provide copies of Morgan District's monthly water loss reports for the year 2025. Consider this an ongoing request.

6. Refer to Morgan District's response to Staff's Second Request, Item 10a. Identify which line was replaced, its remaining useful life at the time of replacement, and the percentage of Morgan District's total water loss was attributable to the area in which this line was replaced.

7. Explain what areas Morgan District has identified as highest priority for improving its water loss. In this explanation, provide the steps Morgan District plans to take to solve these issues.

Linda Bridwell PE

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DATED APR 14 2025

cc: Parties of Record

Case No. 2024-00325

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