

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
CANNONSBURG WATER DISTRICT FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE AND)	CASE NO.
NECESSITY AND FINANCING OF THE SHOPES)	2025-00020
CREEK ROAD AREA WATER SYSTEM)	
IMPROVEMENTS PROJECT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CANNONSBURG WATER DISTRICT

Cannonsburg Water District (Cannonsburg 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 May 30, 2025. The Commission directs Cannonsburg 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.

Cannonsburg District shall make timely amendment to any prior response if Cannonsburg 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 Cannonsburg District fails or refuses to furnish all or part of the requested information, Cannonsburg 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, Cannonsburg 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 Application, Exhibit 21, Estimate of Acquired Property Table. Provide a chart listing the NARUC depreciation life, the date the property will be placed in service, and the date when the first full year of depreciation is expected for each item listed in the exhibit.

2. Provide the anticipated journal entries by Uniform System of Accounts (USoA) Account Numbers to record the financing transactions.

3. Provide the anticipated journal entries by USoA Account Numbers to record the construction completion transactions.

4. Refer to Cannonsburg District's 2023 Annual Report, at page 58, which reports annual water loss of 20.3365 percent. State what percent of reduction Cannonsburg District expects in annual water loss by completing the pumping station and line replacements.

5. Provide the current book value, individually, for the pump station and, in total, for the lines being replaced.

6. Refer to the Application, Item 11, Overview of the Project. State if the proposed demolition of the existing pump station and the construction of the new pump station would result in any interruption of service to customers, and if so, explain the extent, including number and duration of interruptions, as well as how the district would minimize any interruption of water service related to the project.

7. State whether there were any other reasons, besides its submission of the lowest cost proposal, related to the selection of Conhurst LLC for the project.

8. Provide a breakdown of the revenue requirement impact of the project including the following items:

a. Net operating expense increase or decrease by expense component;

b. Annual depreciation, including calculations, for each component for which there are different depreciation lives;

c. Annual debt service for each debt component;

d. Twenty percent working capital on debt service amounts in item 7(c);
and

e. Total of all items above.

9. Provide the cost per thousand gallons impact of the total revenue requirement impact in Request No. 6 based on gallons sold of 281,513 as reported in the water statistics of Cannonsburg District's 2023 Annual Report.

10. Refer to the Direct Testimony of Tim Webb, pages 5–6. Mr. Webb stated that the current pump was manufactured to pump 1,000 gallons per minute. Provide how many gallons per minute the replacement pump is designed to provide, considering the manner Cannonsburg District intends for it to be installed.

11. Refer to the Direct Testimony of Tim Webb at 11. Provide a copy or copies of the easement(s) acquired for the Project.

12. Refer to the Application Exhibit 15, Estimated Cost to Operate. Explain the estimated increase of energy usage by kWh to operate the new Midland Trail Road Pump Station.

13. Refer to the Application at 14, paragraph 23.

a. Explain whether any of the funding components could be affected by federal funding freezes, Executive Orders or other actions by other sources of federal funding that interrupt that funding.

b. Explain how Cannonsburg District would address any funding shortfalls or loss of funding.



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DATED MAY 15 2025

cc: Parties of Record

Case No. 2025-00020

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