

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MORGAN	)	CASE NO.
COUNTY WATER DISTRICT FOR A	)	2025-00296
DECLARATORY ORDER	)	

COMMISSION STAFF'S FIRST 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 October 14, 2025. The Commission directs Morgan 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

---

<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.

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 the Application, Item 8, page 3, which states the funds "will be used to pay off overdue debts of Morgan County Water".

- a. State specifically, which debts the funds will be used for and the amount of funding used for each debt.

b. For each debt listed in response to Item (1)(a), state whether the payment covers the entire overdue amount or if there would still be a balance remaining after the payment.

2. Confirm that the agreement submitted with the application is the current draft of the WWATERS Assistance Agreement for Grant No. 25KWW016, including all exhibits/attachments transmitted by the Kentucky Infrastructure Authority (KIA). If not confirmed, provide the current draft, including all exhibits/attachments.

a. Identify any material terms still subject to change prior to execution and describe the nature of any expected revisions.

b. Provide any award letters, transmittal emails, or KIA correspondence stating conditions or milestones to execute/fund.

c. State whether Morgan District will file a final copy of the final executed agreement in post case filings.

3. Confirm that the final agreement will not include any repayment of principal or interest, maturity schedule, debt service, or sinking fund. If not confirmed, explain the response.

4. Confirm that the agreement will include no pledge, lien, or security interest on Morgan District's revenues or assets. If not confirmed, explain the response.

5. Identify any application, administrative, audit, insurance, or other fees/costs Morgan District must pay as part of receiving the grant. State whether any matching funds or local share is required.

6. List all conditions to receiving funding (e.g., certifications, resolutions, legal opinions) and provide current status of each. Identify any required third-party consents (including lender consents under existing covenants) and provide copies if obtained.

7. Confirm that no construction will occur under this award and that funds will be used solely for financial assistance to retire overdue obligations. If not confirmed, explain the responses.

8. Identify any ongoing operational, maintenance, or procurement obligations created by the award, if any.

9. Provide the anticipated schedule for execution, disbursement(s), and application of funds to the identified debts. In the response, identify any deadlines or expiration dates in the award that could affect timing.



---

Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED **SEP 26 2025**

cc: Parties of Record

\*Morgan County Water District  
1009 Hwy 172  
West Liberty, KY 41472

\*L. Allyson Honaker  
Honaker Law Office, PLLC  
1795 Alysheba Way  
Suite 1203  
Lexington, KY 40509

\*Andy Legg  
Morgan County Water District  
1009 Hwy 172  
West Liberty, KY 41472

\*Heather Temple  
Honaker Law Office, PLLC  
1795 Alysheba Way  
Suite 1203  
Lexington, KY 40509

\*Meredith L. Cave  
Honaker Law Office, PLLC  
1795 Alysheba Way  
Suite 1203  
Lexington, KY 40509