

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

MAR 28 2011

In the Matter of:

PUBLIC SERVICE
COMMISSION

ALTERNATIVE RATE FILING OF)
HILLRIDGE FACILITIES, INC.)

CASE NO. 2010-00426

**REQUEST FOR INFORMATION FROM HILLRIDGE FACILITIES, INC., TO THE
LOUISVILLE AND JEFFERSON COUNTY METROPOLITAN SEWER DISTRICT**

Comes Hillridge Facilities, Inc. (“Hillridge”), by counsel, and for its Requests for Information to the Louisville and Jefferson County Metropolitan Sewer District (“MSD”), states as follows:

- 1) For the time period between 2007 and March 28, 2011, please provide a copy of all written communications between employees, representatives or agents of MSD and the employees, representatives or agents of the Kentucky Division of Water that concern or relate to Hillridge Facilities, Inc., or the Hillridge Wastewater Treatment Plant, including but not limited to letters and e-mails.
- 2) For Zip Code area 40299, please identify each sanitary sewer overflow (“SSO”) from MSD's sanitary sewer system (“sewer system”) in 2008, 2009, 2010 and 2011, the location of the SSO, the amount of water discharged from the SSO, the date of the SSO, how long the SSO has been known to exist and the date it was or will be eliminated.
- 3) For each SSO identified in MSD's answer to Request No. Two, please identify the stream into which the flow from the SSO discharges.
- 4) For Zip Code area 40291, please identify each sanitary sewer overflow (“SSO”) from MSD's sewer system in 2008, 2009, 2010 and 2011, the location of the SSO, the amount of

water discharged from the SSO, the date of the SSO, how long the SSO has been known to exist and the date it was or will be eliminated.

5) For each SSO identified in MSD's answer to Request No. Four, please identify the stream into which the flow from the SSO discharges.

6) For Zip Code area 40023, please identify each sanitary sewer overflow (“SSO”) from MSD's sewer system in 2008, 2009, 2010 and 2011, the location of the SSO, the amount of water discharged from the SSO, the date of the SSO, how long the SSO has been known to exist and the date it was or will be eliminated.

7) For each SSO identified in MSD's answer to Request No. Six, please identify the stream into which the flow from the SSO discharges.

8) For Zip Code area 40243, please identify each sanitary sewer overflow (“SSO”) from MSD's sewer system in 2008, 2009, 2010 and 2011, the location of the SSO, the amount of water discharged from the SSO, the date of the SSO, how long the SSO has been known to exist and the date it was or will be eliminated.

9) For each SSO identified in MSD's answer to Request No. Eight, please identify the stream into which the flow from the SSO discharges. and two.

10) Please identify any SSOs that have occurred in the collection system that serves the Waterson Woods subdivision from March of 2007 through March of 2011.

11) Please identify the sewer mains and/or lines and the wastewater treatment plant that MSD plans to use to convey and/or treat the wastewater that is now treated by Hillridge (“Hillridge Flow”) in the event that MSD is allowed to accept the Hillridge Flow.

12) Please identify any SSOs that have occurred since January of 2007 in the sewer mains and/or lines that MSD plans to use to convey the Hillridge Flow to MSD's wastewater treatment plant.

13) Please identify each time since January 1, 2007, the wastewater treatment plant that MSD plans to use to treat the Hillridge Flow has violated and/or exceeded the parameters of the KPDES permit applicable to said wastewater treatment plant.

14) Please identify each time since January 1, 2007, the wastewater treatment plant that MSD plans to use to treat the Hillridge Flow has violated and/or exceeded the requirements of the Consent Decree entered into by and between MSD and the USEPA, Region IV.

15) Please identify all portions or sections of the MSD sewer system in Zip Code area 40299 that have been air tested, hydrostatic tested or smoke tested in 2007, 2008, 2009, 2010 or 2011, and what were the results of said testing.

16) Please identify all portions or sections of the MSD sewer system in Zip Code area 40243 that have been air tested, hydrostatic tested or smoke tested in 2007, 2008, 2009, 2010 or 2011, and what were the results of said testing.

17) Please identify all portions or sections of the MSD sewer system in Zip Code area 40023 that have been air tested, hydrostatic tested or smoke tested in 2007, 2008, 2009, 2010 or 2011, and what were the results of said testing.

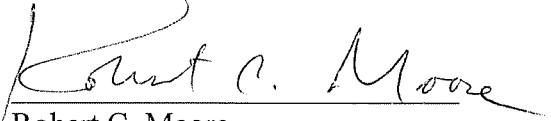
18) Please identify all portions or sections of the MSD sewer system in Zip Code area 40291 that have been air tested, hydrostatic tested or smoke tested in 2007, 2008, 2009, 2010 or 2011, and what were the results of said testing.

19) Please describe in detail the criteria used by MSD to determine whether an SSO from its sewer system has occurred.

20) Please provide a copy of any appraisal, complete or incomplete, that was performed on the Hillridge Wastewater Treatment Plant and/or collection system.

21) Please describe the methodology used by MSD in determining the cost to repair the Hillridge collection system, and the extent of the repairs, and provide copies of any bids or estimates of the cost to repair the Hillridge collection system.

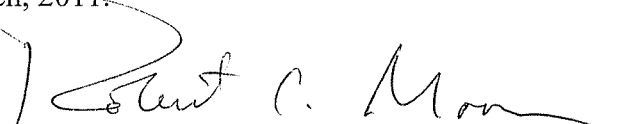
Respectfully Submitted,



Robert C. Moore
Hazelrigg & Cox, LLP
415 West Main Street, 1st Floor
P.O. Box 676
Frankfort, Kentucky 40602-0676

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by first class mail, postage prepaid, on Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Blvd., P.O. Box 615, Frankfort, Kentucky 40602, David Edward Spenard, Assistant Attorney General, 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601-8204 and Laurence J. Zielke and Janice M. Theriot, Zielke Law Firm PLLC, 1250 Meidinger Tower, 462 S. 4th Street, Louisville, Kentucky, on the 28th day of March, 2011.



Robert C. Moore