

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BEECH GROVE WATER)	
SYSTEM, INC. REQUESTING DEVIATION FROM)	CASE NO.
REQUIREMENTS OF 807 KAR 5:066, SECTION 4)	2014-00306
(4))	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO BEECH GROVE WATER SYSTEM, INC.

Beech Grove Water System, Inc. ("Beech Grove"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due 14 days from the issuance of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response 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 response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Applicants shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Beech Grove fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied 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.

1. Refer to the Water Storage Requirement Deviation Request Application (“Application”) filed on August 28, 2014. The Application identifies an 18’ x 55’ high standpipe (“Tank”) with a 100,000-gallon capacity as the only water storage tank in the Beech Grove system.

- a. Describe the location of Beech Grove’s existing water storage Tank.
- b. Provide the ground elevation of the Tank.
- c. Provide the overflow elevation of the Tank.
- d. Provide a representation of the ground elevation of the area served by the Tank. Explain any difference in the elevation of the Tank and the service territory of the customers served by the Tank.

2. Indicate the effective storage of the Beech Grove Tank in gallons, taking into account the minimum pressure requirement of 30 pounds per square inch pursuant to 807 KAR 5:066, Section 5. Explain the impact to effective storage caused by any

difference in elevation between the Tank and the service territory of the Beech Grove customers served by the Tank.

3. Indicate whether the 1970 Water Purchase Contract between West Daviess County Water District and Beech Grove has been renewed or extended. If the Contract has been renewed or extended, provide a copy of each renewal or extension.

4. The August 22, 2014 letter from Tom Williams, Henderson Water Utility General Manager, to Shelia Murphy, Beech Grove Office Manager, supplied with the Application discusses a draft of a new agreement between Henderson Water Utility and Beech Grove. Indicate whether Beech Grove and the city of Henderson ("Henderson") have executed the agreement. If so, then provide a copy of the executed agreement. If not, provide a copy of the draft of the new agreement, describe the status of the discussions between the parties, and identify the tentative date for execution of the agreement.

5. Indicate whether the Beech Grove Tank referenced in the Application is the same standpipe leased by Beech Grove to Henderson pursuant to the 1998 Revised Agreement for the Construction and Installation of Water Main between Beech Grove and Henderson. If not, identify the location of the standpipe leased by Beech Grove to Henderson.

6. Refer to the Plant Statistics (Ref Page: 31) for the 2010 Annual Report of Beech Grove to the Commission. The 2010 Report identifies a 100,000-gallon storage reservoir at ground level as a reservoir of Beech Grove. Refer to Plant Statistics (Ref Page: 31) for the 2013 Annual Report of Beech Grove to the Commission. The 2013 Report does not contain any information regarding reservoirs.

a. Explain why the 100,000-gallon Tank identified in the Application is not identified in the 2013 Report.

b. Explain why the 100,000-gallon storage reservoir identified in the 2010 Report is not identified in the 2013 Report.

7. Refer to the Commission's February 22, 2010 Order in Case No. 2009-00468¹ that orders Beech Grove to comply with the provisions of 807 KAR 5:066, Section 4(4), by November 30, 2014.

a. Identify the steps taken by Beech Grove from February 22, 2010, to the filing of this Application to bring Beech Grove's water storage facilities into compliance.

b. Provide a summary of the communications with Bell Engineering regarding Beech Grove's water storage facilities.

c. For the period from February 22, 2010, to the filing of this Application, provide copies of any letters, electronic mail messages, or other written materials sent to or received from Bell Engineering regarding Beech Grove's water storage facilities.

d. For the period from February 22, 2010, to the filing of this Application, provide copies of the minutes of any meetings of the board of Beech Grove in which Beech Grove's water storage facilities, compliance with 807 KAR 5:066, Section 4(4), and the Commission's February 22, 2010 Order were discussed.

e. For the period from February 22, 2010, to the filing of this Application, indicate whether Beech Grove has made an application to any entity or

¹ Case No. 2009-00468, Application of Beech Grove Water System, Inc. for Water Storage Requirement Deviation (Ky. PSC Feb. 22, 2010).

agency in pursuit of funding for Beech Grove's water storage facilities. Describe the efforts to secure funding and provide a copy of each application for funding.

f. Identify any change in circumstance or other consideration since the Commission's February 22, 2010 Order in Case No. 2009-00468 that support a request for a successive extension of time for Beech Grove to comply with the provisions of 807 KAR 5:066, Section 4(4).

8. The Application indicates that the Beech Grove water board has considered the option of seeking a surcharge as a step in complying with the provisions of 807 KAR 5:066, Section 4(4). Fully describe the surcharge option considered by Beech Grove and describe why this option was not chosen.



Jeff Derouen
Executive Director
Public Service Commission
P. O. Box 615
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DATED OCT 08 2014

cc: Parties of Record

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