

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| EVERGREEN SEWAGE DISPOSAL SYSTEM |) | CASE NO. |
| REQUEST FOR DEVIATION FROM 807 KAR |) | 2014 -00290 |
| 5:071, SECTION 7(4) |) | |

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO EVERGREEN SEWAGE DISPOSAL SYSTEM

Evergreen Sewage Disposal System ("Evergreen"), 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 these requests for information. 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.

Everygreen 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

Evergreen 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 August 13, 2014 letter from Terry Coker to Jeff Derouen, Executive Director, Kentucky Public Service Commission (“Coker Letter”). Terry Coker states, “I am a contractor and not an employee of Evergreen SDS.” Terry Coker further states, “I have been requested by Michael Dailey, President of Evergreen SDS to contact you [Mr. Derouen].” Michael Dailey is to provide a response through which he states whether he, in his capacity as President of Evergreen Sewage Disposal, Inc., requests that the Commission authorize a deviation from 807 KAR 5:071, Section 7(4).

2. Refer to the August 13, 2014 Coker Letter. Terry Coker references “Evergreen SDS.” State whether Terry Coker is referring to Evergreen Sewage Disposal, Inc. (“Evergreen”). If not, state the full corporate name of “Evergreen SDS” and identify the jurisdiction of its incorporation or organization.

3. List and provide a copy of each notice of violation (“NOV”) that Evergreen has received regarding the operations of its sewer facilities from the Kentucky Division of Water since June 1, 2010. State the current status of each NOV.

4. Refer to the August 13, 2014 Coker Letter.

a. Confirm that Terry Coker is a certified wastewater operator.

b. Provide a description of the services Terry Coker provides as a certified operator of the Evergreen sewer plant.

c. Provide a copy of the contract that Evergreen has with Terry Coker.

d. State whether any person(s) other than Terry Coker inspect the Evergreen sewer plant on behalf of Evergreen. If so, identify the other person(s) who inspect the Evergreen sewer plant and how frequently or under what circumstances the person(s) inspect it.

5. Provide Evergreen's total maintenance expense for the year ending December 31, 2013. Identify and describe the major components of this expense.

6. State the current cost of inspecting the Evergreen mechanical equipment.

7. Refer to the August 13, 2014 Coker Letter.

a. Describe the mechanical equipment inspection protocol.

b. Identify the circumstances or events that prompt or require "other (as needed) inspections." State how frequently "other (as needed) inspections" are performed.

8. Describe the actions necessary for Evergreen to implement daily inspections of the Evergreen sewer plant's mechanical equipment.

9. State whether a person who is not a certified operator could perform some of the daily inspections in order to eliminate the need for additional inspections by the certified operator. If Evergreen takes the position that a certified operator must perform all inspections, explain the basis for this position.

10. Describe all alarm systems and monitoring systems that are installed at the Evergreen sewer plant that would enable Evergreen or its agents to monitor or detect problems at the sewer facility without conducting an onsite inspection.

11. Assume that an equipment problem occurs at the Evergreen sewer plant that prevents the mechanical blower from functioning. State the number of days it would take for the plant to become septic after the blower failed.

12. Refer to the August 13, 2014 Coker Letter. Terry Coker states that “[b]uying a monitoring system for the pumps and blower would be about \$2,800.”

a. State the name of or otherwise identify the monitoring system that Terry Coker is discussing.

b. Provide the basis for the cost estimate of approximately \$2,800. If the basis for the estimate was given by or obtained from a vendor, identify the vendor and supply any supporting documentation.

c. State whether Evergreen considered the installation of other monitoring systems. If Evergreen considered any other option, state the decision it reached regarding such option and explain the basis for such decision. Provide any supporting documentation.

13. State whether Evergreen has back-up pumps on site or readily available for installation in the event of a malfunction.

a. If back-up pumps are available, state the amount of time that is necessary to place a back-up pump into service.

b. If back-up pumps are not available, state the amount of time Evergreen estimates would be necessary to acquire such a pump or pumps and place them into service.

14. State the location of the Evergreen sewer plant.

15. Describe the area in the immediate vicinity of Evergreen sewer plant. The description should include the presence of residential properties, schools, nursing home facilities, and industries.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED SEP 24 2014

cc: Parties of Record

Terry A Coker
KY Wasterwater Operator II
106 Shannon Court
Georgetown, KENTUCKY 40324