

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF OLDHAM COUNTY WATER	)	
DISTRICT FOR A CERTIFICATE OF PUBLIC	)	CASE NO. 2006-00065
CONVENIENCE AND NECESSITY TO	)	
CONSTRUCT AN ELEVATED WATER TANK	)	

COMMISSION STAFF'S INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO  
OLDHAM COUNTY WATER DISTRICT

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Oldham County Water District ("Oldham District") file the original and 8 copies of the following information with the Commission within 14 days of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention shall be given to copied material to ensure its legibility. 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 Oldham District's Application at ¶16. For each instance since January 1, 1996 in which Oldham District has restricted customers' water usage due to its inability to store sufficient water to meet customer needs, state the nature of the

restrictions imposed, the time period during which Oldham District imposed these restrictions, and the reasons for the insufficiency (e.g., drought conditions, mechanical or system breakdowns).

2. List and describe each customer complaint received since January 1, 1996 which related to Oldham District's "inability to store enough water to meet . . . [customers'] needs."

3. Provide the preliminary and final versions of all engineering reports that Oldham District prepared or commissioned for the proposed water storage tank.

4. At paragraph 6 of its Application, Oldham District states that its "storage capacity deficiency has been ascertained by the Public Service Commission as well."

a. Provide all documents that support this statement.

b. State whether, in light of the Commission's Order of March 15, 2006, in Case No. 2005-00340,<sup>1</sup> Oldham District still maintains that the Commission had found that the water district suffers from a capacity deficiency.

5. Provide the minutes of the meetings of Oldham District's Board of Commissioners held since January 1, 2001 in which construction of the proposed water storage tank is discussed.

6. Provide all internal memorandums, electronic mail messages, and correspondence in which Oldham District discusses the proposed water storage tank.

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<sup>1</sup> Case No. 2005-00340, Application of Oldham County Water District for a Deviation from the Requirements of 807 KAR 5:066, Section 4(4), Regarding Water Storage (Ky. P.S.C. Mar. 15, 2006).

7. Refer to Oldham District's Application at ¶7.
  - a. Describe the current status of Oldham District's efforts to finance the remaining \$1,550,000 of the total construction cost. This response should include the anticipated terms of any loan (e.g., length, interest rate).
  - b. State the date when Oldham District expects to have final plans for financing the remainder of the total construction cost.
  - c. Explain why the Commission should issue a certificate for the proposed water storage tank if Oldham District has yet to finalize plans for payment of the total construction cost.
8. Refer to Oldham District's Application at ¶7. State whether, if Oldham District finances the remaining portion of the total construction cost with a loan, Oldham District will require a rate adjustment.
9. Provide the bids and bid tabulations for the proposed water storage project.
10.
  - a. Provide all hydraulic analyses that Oldham District has conducted in developing its plans for the proposed water storage tank.
  - b. Provide a hydraulic analysis that addresses the facility that Oldham District proposes to construct and its effect on Oldham District's existing distribution system. This hydraulic analysis shall include a simulation of an average daily demand on Oldham District's distribution system and a peak demand that assumes maximum usage by all wholesale, residential and commercial customers.
11. Provide all demand studies that Oldham District has conducted since January 1, 2000.

12. a. State Oldham District's expected maximum day demand and average day demand for each of the next 5 years.

b. State Oldham District's current maximum day demand and the date on which this level was reached.

c. State Oldham District's average day demand for each of the last 5 years.

13. State why Oldham District is of the opinion that its existing storage facilities are insufficient to meet expected customer demand in the immediate future.



Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED: March 27, 2006

cc: Parties of Record

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