

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ALTERNATIVE RATE FILING OF HILLRIDGE) CASE NO. 2010-00426
FACILITIES, INC.)

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO LOUISVILLE-JEFFERSON COUNTY METROPOLITAN SEWER DISTRICT

Pursuant to 807 KAR 5:001, Commission Staff requests that Louisville-Jefferson County Metropolitan Sewer District. ("MSD") file the original and two copies of the following information with the Commission no later than April 11, 2011, with a copy to all parties of record. Each copy of the information requested shall 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. Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Careful attention shall be given to copied material to ensure its legibility.

Each response shall be answered under oath or, for representatives of a public or private corporation, a partnership, an association or a governmental agency, be accompanied by a signed certification of the preparer or 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.

MSD 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 MSD fails to furnish all or part of the requested information, MSD shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

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.

1. State MSD's intentions regarding the assumption of responsibility for providing sewer collection and treatment service for the area that Hillridge Facilities, Inc. ("Hillridge") currently serves.

2. Describe the circumstances which led to MSD conducting an infiltration and inflow video study of Hillridge's collection system.

3. Describe Hillridge's involvement in MSD's infiltration and inflow video study of Hillridge's collection system.


4. Describe each federal or state regulatory agency approval, if any, that MSD requires to tap into Hillridge's collection system and divert sewage flows to MSD facilities.

5. Describe all actions that MSD must take prior to tapping into Hillridge's collection system and diverting sewage flows to MSD facilities.

6. State the date by which MSD presently anticipates assuming responsibility for providing sewer collection and treatment service for the area that Hillridge currently serves.

7. Describe the severity rating system that is used in the report of MSD's infiltration and inflow video study of Hillridge's collection system. Indicate the significance of each rating used.

8. Assuming that MSD were to acquire responsibility for Hillridge's collection system, describe the actions that MSD must undertake to bring the system into compliance with acceptable standards and state the priority that MSD would place on each action and the expected cost of each action.



Jeff Derouen
Executive Director
Public Service Commission
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DATED: MAR 28 2011

cc: Parties of Record

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