

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF U.S. 60 WATER DISTRICT)	
OF SHELBY AND FRANKLIN COUNTIES FOR A)	CASE NO.
CERTIFICATE OF PUBLIC CONVENIENCE)	2014-00101
AND NECESSITY TO CONSTRUCT)	
PURSUANT TO THE PROVISIONS OF KRS)	
278.020 AND KRS 278.300)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO U.S. 60 WATER DISTRICT

U.S. 60 Water District of Shelby and Franklin Counties ("U.S. 60"), 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 seven 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.

U.S. 60 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 U.S. 60 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. State the number of pressure zones in the U.S. 60 system.
2. For each pressure zone, provide the corresponding maximum day and fire demands.
3. For each existing storage tank in the system, provide the name of the tank, type of the tank, whether it is elevated or a standpipe, total storage volume and effective storage capacity in gallons, and the pressure zone to which it belongs. Tabulate the results.
4. Provide a system map that shows the locations of the existing storage tanks, the proposed tank, and associated pressure zones.
5. The application states that U.S. 60 has a current storage capacity of 360,000 gallons. Provide justification for that assertion.
6. Refer to the response to question 2 of Commission Staff's Initial Request for Information:

a. The response states that U.S. 60 has 488,367 gallons of storage. Explain how this number has been reached. Is it total storage or effective storage?

b. In footnote 1, the Clay Village standpipe is listed at 97,167 gallons with an effective size of about 8,000 gallons. Explain.

c. Provide the basis, assumptions, and any supporting documentation for the fire storage volume calculations provided.

7. Describe the location of the new tank in relation to the locations of the two existing tanks that U.S. 60 intends to decommission, and state whether the current customers served by these two tanks can be served by the new tank at the new location.

8. Refer to the response to question 6 of Commission Staff's Initial Request for Information. Provide an explanation of the apparent incline in the average daily use from 2009 through 2011 and the apparent decline from 2011 through 2013. Provide any reasons that may have influenced such changes. Include any supporting documentation.

9. Refer to the response to question 9 of Commission Staff's Initial Request for Information. It was asserted by Sandy Broughman that the expected future growth rate per year is 4 percent. Provide documentation supporting this assertion. Explain in light of the average daily use pattern presented in U.S. 60's response to Commission Staff's Initial Request for Information No. 6.

10. State Sandy Broughman's qualifications to render an opinion on population growth estimates.

11. State whether U.S. 60 has utilized or examined any population growth information, including, but not limited to, census data, in estimating the future system demand growth. If so, provide supporting documentation.

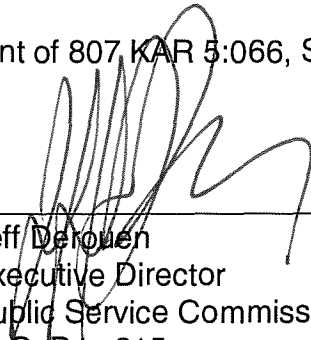
12. Confirm that the district is aware that 807 KAR 5:066, Section 4(4), requires only a minimum storage amount "equal to the average daily consumption."

13. State whether there is any future development planned within proximity of the proposed tank location.

14. State the rationale for the intent to maintain storage in excess of two days' average daily consumption and whether a 500,000-gallon storage tank would provide sufficient storage for current and future use.

15. Provide the estimated service life in years for the proposed 750,000-gallon tank until U.S. 60's system storage becomes out of compliance with minimum storage requirement of 807 KAR 5:066, Section 4. Provide the same for a proposed 500,000-gallon tank. Explain and provide any supporting calculations made.

16. Provide U.S. 60's storage deficit if the two 50-year-old tanks were to be decommissioned in light of the PSC's storage requirement of 807 KAR 5:066, Section 4.



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Public Service Commission
P. O. Box 615
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MAY 12 2014

DATED _____

cc: Parties of Record

Case No. 2014-00101

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