

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

STUART I. GROSS, SR.)	
)	
COMPLAINANT)	
)	CASE NO
V.)	2019-00258
)	
GREEN RIVER VALLEY WATER DISTRICT)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO GREEN RIVER VALLEY WATER DISTRICT

Green River Valley Water District (Green River Valley District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on September 15, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Green River Valley District SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

Green River Valley District shall make timely amendment to any prior response if Green River Valley District obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Green River Valley District fails or refuses to furnish all or part of the requested information, Green River Valley District 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. When filing a paper containing personal information, Green River Valley District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Green River Valley District's Offer of Settlement filed August 25, 2020.
 - a. State the basis for the estimated cost of the proposed project and provide all workpapers used to arrive at the \$50,000 estimated cost.

b. Provide copies of all opinions or studies, including preliminary hydraulic data, that Green River Valley District relied upon when determining this construction project would address the low water pressure problem that is the subject of this complaint.

c. State how Green River Valley District will fund the construction project.

2. State whether Mr. Gross has agreed to the settlement proposal. If not, provide a status update on the settlement negotiations.

3. State whether the three-inch polyvinyl chloride water main Green River Valley District proposes to use in this construction project is compatible in size and composition with the piping in Edmonson County Water District's (Edmonson District) system and the piping in Green River Valley District's system.

4. State whether Edmonson District's connection to Green River Valley District's distribution system will be valved to separate the two districts, or whether there will be any mixing of water from both districts.

5. If there is mixing of water from both systems, state whether a study has been done to compare compatible water qualities and disinfection processes. Provide the results of any tests or studies conducted.

6. State whether the proposed project includes the addition of a control valve or other apparatus to supply water to the Bonnieville Tank, or whether the only customers to be served by this project are Mr. Gross and the six additional customers.

7. State why the proposed line extension will not allow for a flow greater than 2.0 feet per second. Address proposed pipe size, type of blow off, and any other features unique to this project that contribute to or limit flow rate.

8. State whether Green River Valley District will be required to reimburse Edmonson District for the water from Edmonson District's storage tank near Kessinger, Kentucky, used to feed into Green River Valley District's system. If so, state the billing rate Green River Valley District will pay.

9. If Green River Valley District will purchase water from Edmonson District, state the approximate amount of water that will be purchased on a daily basis through the master meter associated with this project.

10. State how Green River Valley District is addressing the low pressure problem at Mr. Gross's residence currently and how Green River Valley District plans to address the problem until construction is complete.

11. Provide a copy of the application and all exhibits submitted to the Division of Water in connection with this project.

12. State how Green River Valley plans to satisfy Mr. Gross's complaint should the Division of Water deny its application for a deviation from flushing regulations.



Kent A. Chandler
Acting Executive Director
Public Service Commission
P.O. Box 615
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DATED SEP 02 2020

cc: Parties of Record

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