

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PROPOSED FILING OF GREEN	)	CASE NO.
RIVER VALLEY WATER DISTRICT TO AMEND	)	2020-00026
ITS TARIFF	)	

COMMISSION STAFF'S FIFTH 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 July 10, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,<sup>1</sup> 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 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

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

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 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 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. Provide an updated response to Commission Staff's First Request for Information (Staff's First Request), Item 1. Provide a copy of all written complaints received by Green River Valley District from January 22, 2020, to the present. If an investigation was conducted by Green River Valley District in relation to a complaint, provide a copy of all documentation in relation to the investigation, including Green River Valley District's findings in the investigation.

2. Refer to Green River Valley District's Reponse to Staff's First Request, Item 2. Provide all information available to Green River Valley District concerning the individual pump located at Mr. John McBride's residence located at 1114 Bunnell Crossing Road, Munfordville, Kentucky.

3. Refer to Response to Staff's First Request, Item 2a.

a. Confirm the pump installed at 2931 Baumgardner Road, Bonnieville, Kentucky, in August 2017 was purchased and installed by Green River Valley District.

b. State whether the pump installed at 2931 Baumgardner Road was installed in Green River Valley District's system at a point before the meter at this location or after the meter at this location.

c. Explain Green River Valley District's decision to place the pump at the location on the system where it was installed.

d. If the pump was placed at a point after the meter at this location, state what alternative action would have been necessary for Green River Valley District to deliver 30 psi at the meter, if the pump had not been placed.

e. Provide a description of the individual pump installed by Green River Valley District, including the size, costs, and expected useful life.

4. Refer to Response to Staff's First Request, Item 2b.

a. Confirm the pump installed at 1134 Bunnell Crossing Road, Munfordville, Kentucky in 1996 was purchased and installed by Green River Valley District.

b. State whether the pump installed at 1134 Bunnell Crossing Road was installed in Green River Valley District's system at a point before the meter at this location or after the meter at this location.

c. Explain Green River Valley District's decision to place the pump at the location on the system where it was installed.

d. If the pump was placed at a point after the meter at this location, state what alternative action would have been necessary for Green River Valley District to deliver 30 psi at the meter, if the pump had not been placed.

e. Provide a description of the individual pump installed by Green River Valley District, including the size, costs and expected useful life.

5. Refer to Response to Staff's First Request, Item 2c.

a. Confirm the pump installed at 1896 Bolton School Road, Bonnieville, Kentucky on July 8, 2018, was purchased and installed by Green River Valley District.

b. State whether the pump installed at 1896 Bolton School Road was installed in Green River Valley District's system at a point before the meter at this location or after the meter at this location.

c. Explain Green River Valley District's decision to place the pump at the location on the system where it was installed.

d. If the pump was placed at a point after the meter at this location, state what alternative action would have been necessary for Green River Valley District to deliver 30 PSI at the meter, if the pump had not been placed.

e. Provide a description of the individual pump installed by Green River Valley District, including the size, costs and expected useful life.

6. Explain how the installation of individual pumps at the customer's expense complies with the requirements of 401 KAR Chapter 8, 807 KAR 5:066 Section 5(1) and the "General Design Criteria for Surface and Ground Water Supplies" as they pertain to water distribution systems and are incorporated by reference in the Kentucky Division of Water regulations.

7. Refer to Green River Valley District's Response to Commission Staff's Second Request for Information (Response to Staff's Second Request), Item 4.

a. Provide the status of the booster pump station construction project.

b. Provide the estimated cost of the booster pump station construction project.

c. Provide the funding source for the booster pump station construction project.

d. Explain whether the booster pump station construction project will require Green River Valley District to obtain a Certificate of Public Convenience and Necessity.

e. Provide an engineering report, hydrolytic analysis, or study showing how the proposed booster pump station project will impact the water pressure in Green Valley River District's distribution system.

f. Provide the estimated beginning and completion date for Green River Valley District's proposed booster pump station construction project.

e. Provide a list of Green River Valley District's customers experiencing pressure below the required 30 psi that the booster pump station is expected to provide with the required 30 psi when completed.

8. Refer to Response to Staff's Second Request, Item 5c, proposed tariff sheet, Section AG. 2. Existing Customers.

a. Provide the legal basis for Green River Valley District's responsibility for maintenance and repair of an individual pump for one year following the installation of the pump on the customer's side of the meter.

b. Provide the legal basis for Green River Valley District's customers' responsibility for maintenance and repair of an individual pump for one year following installation on Green River Valley District's side of the meter.

9. Refer to Green River Valley District's Response to Commission Staff's Third Request for Information, Item 3. Explain whether the reasonable conditions that every utility may place upon the provision of service as articulated in KRS 278.030 apply to customers who are applying for new service as well as existing customers of the utility.

10. State whether any requirements pertaining to Green River Valley District's ability to maintain consistent and adequate water pressure on its system have been placed upon Green River Valley District by The Kentucky Infrastructure Authority (KIA), the United States Department of Agriculture acting through Rural Development (USDA/RD), or the Kentucky Rural Water Finance Corporation (KRWFC) in conjunction with financing of any water improvement project.

11. Provide copies of any assurances of the the ability to maintain consistent and adequate water pressure made by Green River Valley District and provided to KIA, USDA/RD, KRWFC, or the Kentucky Division of Water.

12. State whether Green River Valley District has reviewed its entire system and analyzed where within the system low water pressure is an issue that Green River Valley District needs to address.

a. If there has been a study, analysis, or review of Green River Valley District's distribution system that has identified areas of the water system where low water pressure is an issue, provide a copy of the study, analysis, or review.

b. If no study, analysis, or review of the water system has been completed, explain why Green River Valley District's Board of Commissioners has not authorized this to be completed.

c. Provide all minutes of all Board Meetings at which any study, project analysis, or review of the water system has been discussed from 2015 to the present.

13. Provide a list of all projects that Green River Valley District has completed to address low pressure for the water system from 2015 to the present.

14. Refer to Staff's First Request, Item 4. For all customer locations shown on the map, provide the size of the main serving these customers, the type of material the mains are made of, and the number of line breaks that have occurred on these mains since 2015.

15. State Green River Valley District's policy on installing and maintaining pressure regulators at customer services. State whether this policy is written and how it is conveyed to customers.

17. Refer to Response to Staff's First Request, Item 6.

a. Provide the normal discharge pressure while pumping for the "North Zones," and "South Zones" high service pumps and the Munfordville Pump Station.

b. Provide the typical range of operating levels for the New Horse Cave Tank, the Bonnieville Tank, and the Magnolia Tank.

c. Provide a graph or chart from SCADA showing tank levels for a one-week span for the New Horse Cave Tank, the Bonnieville Tank, and the Magnolia Tank.



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Kent A. Chandler  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED JUN 30 2020

cc: Parties of Record



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