

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY-)	
AMERICAN WATER COMPANY FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE AND)	CASE NO.
NECESSITY AUTHORIZING THE)	2023-00248
CONSTRUCTION OF A WATER TRANSMISSION)	
MAIN TO THE CITY OF MILLERSBURG)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY-AMERICAN WATER COMPANY

Kentucky-American Water Company (Kentucky-American), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on September 1, 2023. The Commission directs Kentucky-American to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky-American shall make timely amendment to any prior response if Kentucky-American obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Kentucky-American fails or refuses to furnish all or part of the requested information, Kentucky-American shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Kentucky-American 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 a copy of any detailed alternative analysis prepared for this project.
2. Regarding the alternative of constructing a main through downtown Paris, provide the estimated capital costs, estimated operating and maintenance costs, and estimated useful life.

3. Regarding the alternative of constructing a main south of Paris, provide the estimated capital costs, estimated operating and maintenance costs, and estimated useful life.
4. Regarding the alternative of main from North Middletown provide the estimated capital costs estimated operating and maintenance cost and estimated useful life.
5. State whether Kentucky-American will complete the work using its own employees or whether contractors will be retained to complete the project.
6. State whether Kentucky-American has considered any alternative materials for the project.
7. State the expected useful life of the main once completed.
8. State whether Kentucky-American inquired whether Paris Water Works could provide a higher volume of water, and if so, what was the response.
9. State whether Kentucky-American anticipates a need for a rate increase, now or in the future, as a result of this project.
10. State how Kentucky-American intends to solicit bids.
11. State what criteria Kentucky-American will use to select a bid.
12. State whether Kentucky-American has communicated with Judy Water Association, Sharpsburg, Nicholas County Water District, Harrison County Water Association, and any other wholesale water purchasers concerning possible future growth and what the responses were. Describe those communications in detail, provide dates of those communications and copies of any written documentation of those communications.

13. Considering that Kentucky-American already provides wholesale water service to both Judy Water Association and Harrison County Water Association, state whether Kentucky-American approached either Judy Water Association or Harrison County Water Association about the potential to wheel water through their systems and replace any existing lines. If so, please describe those communications in detail, provide dates of communications and copies of any written documentation of those communications.

14. State which months over the last three years in which Kentucky-American purchased more than the contractually permitted average daily volume from Paris Water Works and state how much was purchased above the contracted amount.

15. Provide the increased volume of water that will be in the proposed transmission main.

16. State the estimated amount of time it will take to turn over the volume of water in the proposed main based on existing demands.

17. Provide the current average day, peak day, and peak hour demands in Millersburg.

18. State how the current average day, peak day, and peak hour demands in Millersburg were determined.

19. Explain how Kentucky-American determined the velocity of flow required for the hydraulic analysis.

20. State whether Kentucky-American has prepared a water quality analysis based on the aging of the water to be supplied to Millersburg. If so, provide the water quality analysis, if not, state why not.

21. Considering a recent fire, state whether Kentucky-American has prepared a fire protection analysis for Millersburg. If so, provide the analysis, if not, state why.

22. Explain why Kentucky-American is proposing to utilize right-of-way rather than acquiring private easements.

23. State whether Kentucky-American has received the right-of-way permits necessary for the installation.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED AUG 10 2023

cc: Parties of Record

*Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Jeffrey Newcomb
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Honorable Lindsey W Ingram, III
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Molly Van Over
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502