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March 4, 2011

**RECEIVED**

**MAR 07 2011**

**PUBLIC SERVICE  
COMMISSION**

Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

**RE: Case No.: 2010-00426 -- Alternative Rate Filing Application of  
Hillridge Facilities, Inc.**

Dear Mr. Derouen:

Enclosed please find an original and eleven copies of Louisville & Jefferson County Metropolitan Sewer District's Request for Information from Intervenor MSD to Hillridge Facilities, Inc. in the above-referenced matter. Please file the original and ten copies with the Commission and return a filed-stamped copy back to me in the enclosed postage prepaid envelope.

Thank you in advance for your assistance.

Sincerely,

Nancy L. Palmer, Legal  
Assistant to Janice M. Theriot

NP  
Enclosures

**RECEIVED**

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**MAR 07 2011**

**PUBLIC SERVICE  
COMMISSION**

**In the Matter of:**

**ALTERNATIVE RATE FILING APPLICATION OF )  
HILLRIDGE FACILITIES, INC. )**

**) Case No. 2010-00426**

**REQUEST FOR INFORMATION FROM INTERVENOR MSD  
TO HILLRIDGE FACILITIES, INC.**

Comes the Louisville and Jefferson County Metropolitan Sewer District (“MSD”), by counsel, and for its Requests for Information to Hillridge Facilities, Inc., (“Hillridge”) states as follows:

1. In Hillridge’s answer to Commission Staff’s Second Request for Information #12, Hillridge stated that it called all of the contractors that it was familiar with that performed commercial sewer work and repairs and requested bids from those it deemed financially solvent. List all contractors Hillridge called. If Hillridge did not call the following contractors, explain why:

- Flynn Brothers Contracting Inc.
- Construction Solutions of Kentucky LLC
- Duke’s Root Control Service
- T&C Contracting Inc.
- MAC Construction & Excavating, Inc.
- Basham Construction & Rental Company Inc.
- Pace Contracting, Inc.
- E-Z Construction Co., Inc.
- United Construction & Design LLC
- Advanced Paving & Construction, Inc.

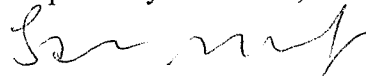
2. The United States Environmental Protection Agency (“USEPA”) has numerous publications and guidance documents regarding technologies and methods used to reduce the impact of sanitary sewer overflows. Has Hillridge consulted any such USEPA publications and guidance documents, if so which ones; if not, why not?

3. Has Hillridge studied the characteristics of the wet weather flow in the Hillridge sewer system or at the Hillridge Wastewater Treatment Plant (e.g., peak flow rate, flow volume, concentration of key pollutants, frequency and duration of wet weather events)? Is so, what is the result of the studies; if not, why not?
4. In Hillridge's answer to Commission Staff's Second Request for Information #5, Hillridge stated that an infiltration and inflow study examined approximately ninety percent (90%) of the entire Hillridge collection system. Explain why the remaining collection system was not examined, the state of the remaining collection system, and Hillridge's plans to correct any inflow and infiltration in the remaining collection system.
5. What stream does Hillridge discharge into?
6. During wet weather events, does any discharge bypass the plant and enter the stream without full treatment?
7. What policies has Hillridge adopted to ensure best operation and maintenance of the sewer system and sewer plant to avoid sanitary sewer overflows?
8. What policies has Hillridge adopted to ensure that the collection system does not deteriorate structurally or become clogged by fats, oils and grease?
9. How many Sanitary Sewer Overflows ("SSOs") has the system experienced in the past calendar year?
10. What public education programs has Hillridge adopted to reduce pollutant loads?
11. What inspections does Hillridge perform on the collection system to track condition and identify potential problems? What is the inspection timetable?
12. What is the sewer cleaning schedule for the system. How does Hillridge flush or clean sludge, sediment, debris and fats, oils and grease from the sewer system?

13. How is the public notified in the event of a SSO or system bypass?
14. When was the last time the sewer system or any part of it was air tested and what were the results of the test? What of hydrostatic testing, or smoke testing?
15. Has Hillridge conducted any sewer investigations to identify bottlenecks or constrictions that limit flow in specific areas and prevent downstream treatment capacity from being fully utilized? Is so, what were the results; if not, why not?
16. Are there any flow meters anywhere in the Hillridge system or at the Hillridge plant? What data is obtained from the flow meters and how long is the data kept?
17. What practices has Hillridge adopted to maximize wet weather flows to the treatment plant?
18. When was the collection system constructed and who constructed it? Provide invoices and payment information for that construction. Provide reports filed with the PSC regarding same.
19. When lots served by the Hillridge system were originally sold, were the lot owners provided access to the collection system? Were lot owners charged a connection fee? If so, how much, who paid and when?
20. When was the Hillridge treatment plant built, who built it at what cost? Is it fully depreciated on tax returns?
21. Are the sewer lines in easements and are they dedicated to the public on the subdivision plat?
22. At any time since it was built was the Hillridge plant or sewer lines held in trust or the subject of a trust indenture? If so, please provide a copy of all trust documents.

23. Does Hillridge have individual contracts for sewer service with any homeowners or customers? If so, please provide copies.
24. Does Hillridge's construction permit contain language that states that the permit is temporary and once sewers are available, the permit shall end? Provide copy of the construction permit.
25. Has Hillridge repaired any of the collection system in the past? If so, provide information on the repairs including a description, time of repair, contractor and costs.
26. Is Hillridge going to repair manhole covers and/or chimneys to stop inflow and infiltration? If so, give details regarding the particular manholes and repairs; if not, why not?
27. Has Hillridge considered sliplining any of the collection system to stop inflow and infiltration? If so, explain which sections will be sliplined; if not, why not.
28. What investigation did Hillridge perform to ensure that the contractor it chose for the planned repairs has experience with repairing sewer systems?
29. Has Hillridge obtained a guarantee or warranty that the repairs its contractor will perform will reduce inflow and infiltration? If so, provide a copy; if not, why not.

Respectfully submitted,



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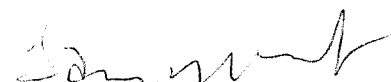
**CERTIFICATE OF SERVICE**

Counsel certifies that, on this the 4<sup>th</sup> day of March 2011, an original and ten copies of this **REQUEST FOR INFORMATION FROM INTERVENOR MSD TO HILLRIDGE FACILITIES, INC.** was filed via overnight delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601. A copy was served on the following by U.S. Mail, first-class, postage prepaid:

Hon. Robert C. Moore  
Attorney at Law  
Hazelrigg & Cox LLP  
415 West Main St.  
P.O. Box 676  
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Sonja Ridge  
Hillridge Facilities, Inc  
17825 Bradbe Road  
Fisherville, KY 40023

David Edward Spenard  
Assistant Attorney General  
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Counsel for MSD