

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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APR 14 2011

In the Matter of:

ALTERNATIVE RATE FILING OF
HILLRIDGE FACILITIES, INC.

)
)

PUBLIC SERVICE
COMMISSION

CASE NO. 2010-00426

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

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

1) Hillridge’s Answer to Commission Staff’s Requests for Information, Hillridge attached several Notices of Violation from the Kentucky Division of Water. In several of the Notices of Violation, the Kentucky Division of Water ordered Hillridge to prepare and submit corrective action plans. See, e.g., Notice of Violation dated 10/22/2008, violation number one, which requires a corrective action plan by November 26, 2008 regarding permits limits for total suspended solids. Please provide a copy of each corrective action plan submitted by Hillridge to the Kentucky Division of Water within the last 10 years.

Answer: Objection. Hillridge objects to this request on the basis that it requests information irrelevant to the above-styled application for rate adjustment and surcharge. However, without waiving this objection, Hillridge states that it has not filed a formal corrective action plan with the Kentucky Division of Water. However, the DOW does have a copy of the repairs to be made to the collection system to prevent inflow and infiltration as set forth on Attachment A.

Sonja Ridge

STATE OF KENTUCKY

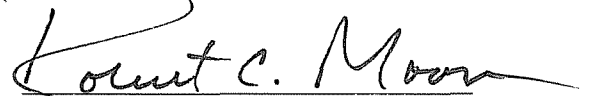
COUNTY OF FRANKLIN

Subscribed and sworn to before me by Sonja Ridge, as her own free act and deed this
13th day of April, 2011.

My Commission expires: _____

Notary Public, State at Large

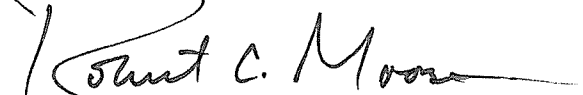
Respectfully Submitted,



Robert C. Moore
Hazelrigg & Cox, LLP
415 West Main Street, 1st Floor
P.O. Box 676
Frankfort, Kentucky 40602-0676

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by first class mail, postage prepaid, on Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Blvd., P.O. Box 615, Frankfort, Kentucky 40602, David Edward Spenard, Assistant Attorney General, 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601-8204 and Laurence J. Zielke and Janice M. Theriot, Zielke Law Firm PLLC, 1250 Meidinger Tower, 462 S. 4th Street, Louisville, Kentucky, on the 13th day of April, 2011.



Robert C. Moore

MURPHYS EXCAVATING
379 BROOKSVIEW CR.
BROOKS, KY. 40109
PHONE-9573775-MOBIL-7733526-FAX-9576185
2-26-10

HILLRIDGE FACILITIES INC.

BID PROPOSAL FOR:
REPAIRING SEWER LINES & STOPPING INFILTRATION & INFLOW OF WATER
PAGE 1

- 3905 LETHBOROUGH CT— REPAIR BROKEN PIPING BELOW MANHOLE, HAS LARGE HOLE APPROX. 2FT. LONG— REPLACE APPROX. 6FT. OF BROKEN TERRA COTTA PIPE.
 - 8517 OLD WATTERSON TRAIL— REPLACE BROKEN PIPING JUST BELOW MANHOLE
 - 3400 LA FOLLETTE— LARGE AMOUNT OF BROKEN PIPE & WATER INFILTRATION, REPLACE APPROX. 10FT. OF TERRA COTTA PIPE.
 - 3904 BONAFAY CT.—REPLACE BAD T CONNECTION & BROKEN PIPING.—BAD I & L
 - 3700 MODESTO— BROKEN PIPING, REPLACE 5FT.
 - 3913 SAN MARCOS— APPROX. 15FT. OF PIPING BROKEN, LARGE AMOUNT OF HOLES, GRAVEL & INFILTRATION.
 - 4111 STONEY BROOK— DROPPED & SEPARATED PIPING—REPLACE 1 SECTION.
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- 8" MAIN BETWEEN STONEY BROOK & THE LIFT STATION AT KIRBY LN.—LARGE HOLE IN PIPING, NEXT TO CREEK.—REPLACE 1 SECTION.
 - 8900 STONEY BROOK—LARGE HOLE IN PIPING, WATER INFILTRATION
 - 8808 AVONDALE— BROKEN PIPES & DROPPED & MISALIGNED PIPES.
 - 8807 KIRBY LN.—JUST BEFORE LIFT-STATION: CRACKED & BROKEN PIPING—7 LOCATIONS.

ATTACHMENT A

PAGE 2

- 3716 BRISTOL OAKS—LARGE AMOUNT OF ROOTS & INFLITERATION AT 5 LOCATIONS.
- 3913 BONAFAY CT.—MULTIPLE FRACTURES ABOVE & BELOW MANHOLE--- ROOTS & WATER INFLITERATION.
- 9102 LETHBOROUGH—CRACKED PIPES & LARGE AMOUNT OF ROOTS.
- 9211 LETHBOROUGH—LARGE AMOUNT OF ROOTS AT 56FT. DOWNSTREAM FROM MANHOLE.
- LARGO CT.— LARGE AMOUNT OF ROOTS AT 6 LOCATIONS, DOWNSTREAM FROM MANHOLE.
- WAKULLA CT.—WATER COMING IN AT 4 LOCATIONS, JUST BEFORE LIFTSTATION.
- 4003 STONYBROOK RD.— ROOTS AT 5 LOCATIONS.
- 4002 STONYBROOK RD.— BAD ROOTS AT 3 LOCATIONS.
- 3822 SHANNON RUN TRAIL— 8" MAIN RUNNING TO LIFT STATION & NEXT TO CREEK, BAD I & I AT 3 LOCATIONS.
- INTERSECTION OF LACOSTA & COLLINGWOOD— ROOTS & CRACKED PIPES RUNNING ENTIRE LEGNTH.
- ---

LARGE 15IN. MAIN, JUST BELOW SAN MARCUS & WATTERSON TRAIL, HAS LARGE AMOUNT OF ROOTS IN MANHOLE & IN EVERY OTHER SECTION OF PIPE---176 FT. LONG.
- FROM MANHOLE AT THE END OF LETHBROUGH CT. TO 8IN. MAIN IN DITCHLINE, ROOTS & CRACKED PIPE 200FT. LONG.

- FULL LABOR PRICE OF ALL REPAIRS----- \$196,600.00
- PARTS: PAVEMENT, CONCRETE, PIPING
PERMITS & BONDING-----\$ 93,400.00
- TOTAL-----\$290,000.00

TWO HUNDRED NINETY THOUSAND DOLLARS

THANK YOU

JOSEPH MURPHY
