

# Berger & Nienaber

John A. Berger  
Thomas R. Nienaber

ATTORNEYS AND COUNSELORS AT LAW  
401 Madison Avenue Covington, Kentucky 41011  
(859) 491-9088 Fax (859) 491-9854

Gregory N. Schabell  
R. Leslie Knight  
Bryan C. Berger

May 9, 2012

Public Service Commission  
Attn: Mr. Jeff Derouen  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

Re: Grant County Sanitary Sewer District  
Case No. 2012-00109

Dear Mr. Derouen:

Enclosed please find a Supplemental Filing filed on behalf of the Grant County Sanitary Sewer District in the subject case.

Should you have any questions, please do not hesitate to call.

Very truly yours,

BERGER & NIENABER, P.S.C.

  
Thomas R. Nienaber

TRN/css

Enclosure

cc: Grant County Sanitary Sewer District  
Attn: Mr. Bobby Burgess

NOISSIMMO  
PUBLIC SERVICE  
COMMISSION

MAY 11 2012

RECEIVED

RECEIVED

MAY 11 2012

PUBLIC SERVICE  
COMMISSION

John A. Berger  
Thomas R. Nienaber

Berger & Nienaber  
ATTORNEYS AND COUNSELORS AT LAW  
401 Madison Avenue Covington, Kentucky 41011  
(859) 491-9088 Fax (859) 491-9854

Gregory N. Schabell  
R. Leslie Knight  
Bryan C. Berger

May 9, 2012

RECEIVED

MAY 11 2012

PUBLIC SERVICE  
COMMISSION

Public Service Commission  
Attn: Mr. Gerald E. Wuetcher  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

Re: Grant County Sanitary Sewer District  
Case No. 2012-00109

Dear Mr. Wuetcher:

Pursuant to your request of May 9, 2012, please accept this correspondence as the Grant County Sanitary Sewer District's ("District") Response to your request for additional information regarding the subject Application.

During the design stages of the Phase I Project, the District determined that a main pump station would need to be constructed on the east side of I-75 near the Cincinnati South Campground, US Highway 25, Dry Ridge, Kentucky 41035. In order to service that pump station, 3 phase electric was required. The District was originally informed by representatives of Duke Energy that 3 phase electric was reasonably available to the pump station site. However, after commencement of construction of the Phase I Project, it was determined that 3 phase electric was not available in the area. As a consequence, the District was required to bring 3 phase electric service to the pump station site. This project required the District to bore under I-75 at a cost of approximately \$80,000.00. Additional expenses in bringing 3 phase electric to the pump station site, including labor and materials cost an additional \$40,000.00. Overall, the District was required to expend approximately \$120,000.00 over its original construction cost estimate.

To cover the unanticipated cost overage, the District paid that cost from its cash reserves with the intent of securing the additional financing to reimburse the District for those funds expended. As the District is only required to repay approximately 50% of the \$133,000.00 loan amount, it is in the District's best financial interest to secure this loan for the purposes so stated.

Should you have any additional questions regarding this matter, please do not hesitate to

May 9, 2012  
Page 2

call. Per your email of May 9, 2012, I am also filing the attached statement in the District's file with the PSC.

Very truly yours,

BERGER & NIENABER, P.S.C.



Thomas R. Nienaber

TRN/css

cc: Grant County Sanitary Sewer District  
Attn: Mr. Bobby Burgess

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**APPLICATION OF THE GRANT COUNTY SANITARY SEWER DISTRICT**  
**FOR**  
**CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT**  
**PROPOSED SANITARY SEWER LINE IMPROVEMENTS**  
**AND**  
**APPROVAL OF THE PROPOSED PLAN TO FINANCE THE IMPROVEMENTS**

**CASE NO. 2012-00109**

**SUPPLEMENTAL FILING**

Comes now the Grant County Sanitary Sewer District (“District”), through Counsel Thomas R. Nienaber, and in response to the Public Service Commission’s request for additional information dated May 9, 2012, states as follows:

During the design stages of the Phase I Project, the District determined that a main pump station would need to be constructed on the east side of I-75 near the Cincinnati South Campground, US Highway 25, Dry Ridge, Kentucky 41035. In order to service that pump station, 3 phase electric was required. The District was originally informed by representatives of Duke Energy that 3 phase electric was reasonably available to the pump station site. However, after commencement of construction of the Phase I Project, it was determined that 3 phase electric was not available in the area. As a consequence, the District was required to bring 3 phase electric service to the pump station site. This project required the District to bore under I-75 at a cost of approximately \$80,000.00. Additional expenses in bringing 3 phase electric to the pump station site, including labor and materials cost an additional \$40,000.00. Overall, the District was required to expense approximately \$120,000.00 over its original construction cost estimate.

To cover the unanticipated cost overage, the District paid that cost from its cash reserves with the intent of securing the additional financing to reimburse the District for those funds expended. As the District is only required to repay approximately 50% of the \$133,000.00 loan amount, it is in the District’s best financial interest to secure this loan for the purposes so stated.

Respectfully submitted,

BERGER & NIENABER, P.S.C.

---

Thomas R. Nienaber - KBA#51820  
401 Madison Avenue  
Covington, KY 41011  
(859) 491-9088