

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF JESSAMINE-SOUTH ELKHORN)
WATER DISTRICT FOR A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY TO) CASE NO. 2012-00470
CONSTRUCT AND FINANCE A WATERWORKS)
IMPROVEMENTS PROJECT PURSUANT TO KRS)
278.020 AND 278.300)

COMMISSION STAFF'S REQUEST FOR INFORMATION
TO JESSAMINE-SOUTH ELKHORN WATER DISTRICT

Pursuant to 807 KAR 5:001, Jessamine-South Elkhorn Water District ("Jessamine-South Elkhorn District") shall file with the Commission no later than December 11, 2012, the original and five copies of the following information, with a copy to all parties of record. Responses to requests for information shall be appropriately bound, tabbed and indexed. 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 person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry. Jessamine-South Elkhorn District shall make timely amendment to any prior response if it 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 Jessamine-South Elkhorn District fails or refuses to

furnish all or part of the requested information, Jessamine-South Elkhorn District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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.

1. Provide hydraulic analyses, supported by computations and actual field measurements, of typical operational sequences of Jessamine-South Elkhorn District's distribution system. These hydraulic analyses should demonstrate the operation of all pump stations and the "empty-fill" cycle of all water storage tanks. Computations are to be documented by a labeled schematic map of the system that shows pipeline sizes, lengths, connections, pumps, water storage tanks, wells, and sea level elevations of key points, as well as allocations of actual customer demands. Flows used in the analyses shall be identified as to whether they are based on average instantaneous flows, peak instantaneous flows, or any combination or variation thereof. The flows used in the analyses shall be documented by actual field measurements and customer use records. Justify fully any assumptions used in the analyses.

2. Provide the minutes of each meeting of Jessamine-South Elkhorn District's Board of Commissioners in which the purchase of the one acre tract that is the proposed water storage tank site.

3. Provide the deed in which title to the proposed water storage tank site was conveyed to Jessamine-South Elkhorn District.

4. Provide a copy of the minutes of each meeting of Jessamine-South Elkhorn District's Board of Commissioners in which the proposed water storage tank or the need for such tank was discussed.

5. Describe how Jessamine-South Elkhorn District determined the size of the proposed storage tank. Provide all studies, state all assumptions, and show all calculations used in making this determination.

6. List and describe each discussion that Jessamine-South Elkhorn District or its representatives or agents had with the Kentucky Division of Water regarding the need for the proposed water storage tank.

7. Provide all correspondence, electronic mail messages, and other written communication regarding the proposed water storage tank between Jessamine-South Elkhorn District and its agents and representatives and the Kentucky Division of Water.

8. List the names of the persons who serve on Jessamine-South Elkhorn District's Board of Commissioners between 2001 and 2005.

9. Provide all studies, reviews, and analyses that Jessamine-South Elkhorn District has conducted on possible locations for the proposed water storage tank.

10. Assume the issuance of a Certificate of Public Convenience and Necessity for the proposed facility on February 1, 2012. State the expected date of commencement of construction and expected time required for completion of construction.

11. Refer to Jessamine-South Elkhorn District's Application, Exhibit A. Define the boundaries of the area that is referred to as the "northwest service area of Jessamine-South Elkhorn Water District."

12. Provide the number of customers in the northwest service area that Jessamine-South Elkhorn District served on December 31 of each year between 2006 and 2011.

13. Provide all correspondence, electronic mail messages, and other written communication regarding the proposed water storage tank between Jessamine-South Elkhorn District and its agents and representatives and representatives of Barry Mangold, T. Logan Davis, Forest Hills Residents' Association or William Bates.

14. List all complaints that Jessamine-South Elkhorn District has received since January 1, 2009 regarding low water pressure in its northwest service area.

15. List and describe all of Jessamine-South Elkhorn Water District's water storage facilities that are located in its northwest service area.

16. Provide the capital improvement plan system storage study that Jessamine-South Elkhorn District instructed Horne Engineering, Inc. to prepare in 2004.

17. Provide all correspondence, electronic mail messages, and other written communication regarding the proposed water storage tank between Jessamine-South Elkhorn District and its agents and representatives and other governmental officials or agencies.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602

DATED: DEC 04 2012

cc: Parties of Record

Honorable W. Randall Jones
Attorney at Law
Rubin & Hays
Kentucky Home Trust Building
450 South Third Street
Louisville, KENTUCKY 40202

Bruce E Smith
201 South Main Street
Nicholasville, KENTUCKY 40356

Honorable Robert M Watt, III
Attorney At Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801