

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF TODD COUNTY WATER)	
DISTRICT FOR A CERTIFICATE OF PUBLIC)	CASE NO.
CONVENIENCE AND NECESSITY TO)	2014-00086
CONSTRUCT AN OFFICE BUILDING AND)	
WAREHOUSE FACILITY)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO TODD COUNTY WATER DISTRICT

Todd County Water District ("Todd District"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due 14 days from the issuance of this request for information. 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 the 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.

Todd 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

~~Todd District fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.~~

Careful attention shall 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 the time period for which Todd District has rented the existing facilities.

2. Provide a detailed description of the existing office building and maintenance/storage facility. Include depictions of floor plans and diagrams with dimensions.

3. Provide Todd District's number of office and field employees.

4. Describe how Todd District utilizes both the current office building and the maintenance/storage facility. Include and demonstrate all activities on the requested floor plans and diagrams. For each activity, include the number of employees and number of vehicles involved. Provide the total number and type of vehicles Todd District owns.

5. State whether Todd District owns and/or operates its own meter-testing facilities and explain whether testing is conducted on the premises of the maintenance/storage facility.

~~6. Provide the cost of operation of the existing office building and maintenance/storage facility. Present supporting details and documentation (utility bills, etc.).~~

7. Refer to Todd District's Supplement to the Application, Item 2, Todd District states, "The landlord is not willing to take the necessary steps to modify the facility to meet the District's and customers' needs."

a. Describe the necessary steps and the corresponding modifications.

b. Provide an estimate of the cost to implement such modifications.

c. Clarify whether the landlord (city of Elkton) or Todd District would have born the cost of these modifications.

d. Provide copies of any written communication between Todd District and the city of Elkton which supports the contention made above.

8. Justify the need for the maintenance and storage facility. Describe what activities will be undertaken there. Include the number of employees and vehicles involved.

9. State how the proposed location was selected. Indicate whether a feasibility study was conducted for the selection of the location.

10. Provide any available studies, analyses, correspondence, electronic mail messages, board meeting minutes, and other written documents that discuss the location and the purchase of the land needed for this project. State whether any other locations were considered, and include a map.

11. Identify all energy-efficiency measures that Todd District has proposed to be incorporated into the new facilities.

~~12. Refer to Todd District's Second Supplement to the Application. Todd District submitted five bid documents.~~

- a. Identify the winning bidder.
- b. Provide documentation supporting the selection of the winning bidder. Include any correspondence, electronic mail messages, board meeting minutes, and any other written documents that discuss the selection of the winning bidder.
- c. Provide additional justification as to why the lower bidders, including the lowest bidder, were not selected.

13. Refer to Todd District's Supplement to the Application, Item 7.

- a. Provide a justification of each of the costs presented as part of the total estimated annual cost of operation of the new facilities after being placed in service.
- b. Provide supporting documentation: include the names of utilities that will provide electric, water, wastewater, telephone, and gas services at this new location and note the utility cost differences between the existing and proposed locations.
- c. Provide a comparison between this estimate and the cost of operation of the existing facilities as requested in question 6 of this data request. Tabulate the results.

14. Provide the size of the new parcel of land in acres. Indicate whether a smaller or other lot size has been considered. Provide the cost of the lot and state whether this cost is included in the total cost of the proposed project.

15. Explain how the lack of either a maintenance or a storage facility may be a contributing factor to a compromised level of service to Todd District's customers.

16. Provide a list, with amounts, of applicable professional service fees (engineering, architectural, legal, etc.) that have been or are expected to be incurred, and state whether such amounts are already included in the cost estimates indicated in the application.

17. Provide a detailed list of all items included in the total cost of the project.



Jeff Derbuen
Executive Director
Public Service Commission
P. O. Box 615
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DATED MAY 15 2014

cc: Parties of Record

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