

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) CASE NO.
NECESSITY TO CONSTRUCT AND FINANCE A) 2014-00084
WATERWORKS IMPROVEMENT PROJECT)
PURSUANT TO KRS 278.020 AND 278.300)

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

Jessamine-South Elkhorn Water District ("JSEWD"), pursuant to 807 KAR 5:001, shall 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 on or before October 10, 2014. 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.

JSEWD 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 JSEWD fails or refuses to furnish all or part of the requested information, JSEWD 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.

1. Refer to page 28 of the Storage Analysis prepared by Horne Engineering, Inc. on March 1, 2014 ("Storage Analysis") provided with the Application.

a. Describe the method used to select the 13 buildings chosen to calculate the storage volume in the proposed tank. Include why these 13 buildings and locations were selected.

b. Provide how the fire volumes for each location were determined.

2. Refer to page 25 of the Storage Analysis and the Water Usage Northwest Area chart for August 2011 to July 2012 ("Water Usage Chart") provided in the Application in Case No. 2012-00470¹ that has been incorporated into this

¹ Case No. 2012-00470, Application of Jessamine-South Elkhorn Water District for a Certificate of Public Convenience and Necessity to Construct and Finance a Waterworks Improvements Project Pursuant to KRS 278.020 and 278.300 (Ky. PSC filed Oct. 26, 2012).

case. Page 25 of the Storage Analysis refers to a maximum day demand of 1,784,250 gallons on July 6, 2010. The Water Usage Chart indicates the maximum day usage in July 2012 was 1,929,375 gallons.

- a. Identify the correct maximum day demand.
 - b. Explain the two different amounts.
3. Provide a discussion regarding any provision of corrosion control as it relates to the design of the proposed tank. Include inspection procedures for this tank as it pertains to 807 KAR 5:006, Section 26.



Jeff Derbuen
Executive Director
Public Service Commission
P.O. Box 615
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DATED SEP 24 2014

cc: Parties of Record

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