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October 9, 2014

**VIA UPS**

Mr. Jeff R. Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602

RECEIVED

OCT 10 2014

PUBLIC SERVICE  
COMMISSION

Re: Jessamine-South Elkhorn Water District Notice of Filing

Dear Mr. Derouen:

Delivered under cover of this letter is an original and ten (10) copies of **Jessamine-South Elkhorn Water District's Responses to the Kentucky Public Service Commission's First Requests for Information** with attachments.

Sincerely,



Bruce E. Smith

Enclosures

cc: Robert M. Watt, III, Esq.  
Jennifer Black Hans, Esq.

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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

OCT 10 2014

PUBLIC SERVICE  
COMMISSION

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 )

CASE NO 2014- 00084

JESSAMINE-SOUTH ELKHORN WATER DISTRICT’S RESPONSES TO THE  
KENTUCKY PUBLIC SERVICE COMMISSION’S FIRST REQUESTS FOR  
INFORMATION

Comes the Jessamine-South Elkhorn Water District (“Water District”), by counsel, and for its Responses to the First Requests for Information from the Kentucky Public Service Commission (“PSC”), answer as follows:

Facts, documents and things now known may be imperfectly understood and, accordingly, such facts, documents, and things may not be included in the following responses. The Water District reserves the right to reference, discover, or offer into evidence at a later time any and all facts, documents and things notwithstanding the initial responses and objections interposed herein. The Water District also reserves the right to reference, discover, or offer into evidence at a later time any and all facts, documents, and things that it does not presently recall but may recall at some time in the future.

To the extent that The Water District inadvertently discloses information that may arguably be protected from discovery under attorney-client privilege, the work product doctrine, or any other applicable privilege, such inadvertent disclosure does not constitute a waiver of any such privilege.

The responses set forth below are made without in any manner waiving (1) the right to object to the use of any response for any purpose, in this proceeding or any other action, on the grounds of privilege, relevance, materiality, or any other appropriate grounds: (2) the right to object to any other documents requests involving or relating to the subject matter of the responses herein; and (3) the right to revise, correct, supplement or clarify any of the responses provided below, at any time.

Subject to and without waiving the reservations set forth above, the Water District responds as follows to PSC's Requests for Information in accordance with the Water District's understanding of the fair meaning of those Requests. The respondent or witness for each Response will be shown in bold-faced type following the Response or that portion of the Response for which the individual is responsible.

**REQUESTS FOLLOW ON NEXT PAGE**

## Jessamine-South Elkhorn Water District

1. **Information Request No. 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.

**Answer:**

**1. a - As supported by the various footnote references in the Storage Analysis, the Needed Fire Flows (NFF) for a service area should be the maximum NFF required for all structures in the service area. Although NFF for a structure is not directly predicated on the usage classification of that structure, the selection of test structures was conducted to include structures within the usage classification of Historic, Office, Residential, Church, Retail, and Agricultural.**

**Based on the Engineer's familiarity with the service areas (45-years of engineering/surveying practice in Jessamine County), structures were selected that would provide a representative sample of NFF. Selection of two or more structures in the same usage**

classification were made in order to account for different types of building construction.

1. b - The formula shown on p. 28 of the Storage Analysis was applied to the thirteen (13) listed structures. Based on the Engineer's experience and familiarity and a site visit to each of the selected structures, the equation components of F, O, X, and P were determined by application of the appropriate table and values contained in Section 300 (pages 5-13) of Fire Suppression Schedule, Insurance Services Office, Inc., (2012). From these determined formula components, the NFF for that structure was calculated.

Interestingly, the maximum NFF (540,000 gallons) occurred for three (3) of the thirteen (13) selected structures and encompassed the usage classification of Historical, Church, and Stable.

[Witness: John G. Horne]

**Jessamine-South Elkhorn Water District**

1. **Information Request No. 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 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.

**Answer:**

1. **a - The July 6, 2010 maximum day demand of 1,784,250 gallons is correct for this analysis**
1. **b - Demand data for the year 2010 was selected as the base year for this analysis. The reason 2010 was selected is because it is the year of the most recent census data. Population projections are based on this base year. While there is a higher maximum day demand in 2012, the 2010 maximum day demand was used for consistency of using 2010 census data.**

[Witness: John G. Horne]

**Jessamine-South Elkhorn Water District**

1. **Information Request No. 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.

**Answer:** The District's experience has proven that the current method of epoxy/epoxy coating has proven to be far superior to other types of protection such as wax coating and/or cathodic protection. Even today, there has been significant advances in coating systems as compared to those used previously in the District's existing tanks.

The District employs the services of J & J Pressure Washing & Tank Services to conduct an annual inspection of all their tanks, both elevated and standpipe. These inspection include visual structural and coating analysis. In addition, the District has, in the past, employed a firm to conduct underwater inspection of the interior bowl.

[Witness: John G. Horne]

**CERTIFICATION**

Comes John G. Horne, consulting engineer for the Jessamine-South Elkhorn Water District ("District") and after first being duly sworn states that he supervised the preparation of this response on behalf of the District and that the foregoing responses are true and accurate to his knowledge, information and belief after a reasonable inquiry.

  
\_\_\_\_\_  
John G. Horne

COMMONWEALTH OF KENTUCKY  
COUNTY OF JESSAMINE, SCT...

Acknowledged, subscribed and sworn to me, a Notary Public in and before said County and State by John G. Horne, consulting engineer for the Jessamine-South Elkhorn Water District, this the 9th day of October, 2014.

 433464  
\_\_\_\_\_  
NOTARY PUBLIC NO.

Respectfully submitted,

Anthony G. Martin, Esq.  
P.O. Box 1812  
Lexington, KY 40588

and

Bruce E. Smith, Esq.  
Henry E. Smith, Esq.  
201 South Main Street  
Nicholasville, Kentucky 40356

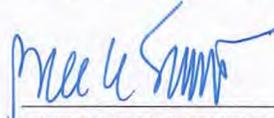
  
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**CO-COUNSEL FOR DISTRICT**

## CERTIFICATE OF SERVICE

I hereby certify that the foregoing Jessamine-South Elkhorn Water District's Responses to Kentucky Public Service Commission's First Set of Requests or Information was served by first class mail, postage prepaid and e-mail, this the 9th day of October, 2014, to:

Robert M. Watt, III, Esq.  
Monica H. Braun, Esq.  
Stoll Keenon Ogden, PLLC  
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BRUCE E. SMITH