

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF WESTERN FLEMING COUNTY)	
WATER DISTRICT REQUESTING A DEVIATION)	CASE NO.
FROM REQUIREMENTS OF 807 KAR 5:066,)	2016-00424
SECTION 4(4))	

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

Western Fleming County Water District ("Western Fleming"), 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 within 14 days of the date of this request. 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.

Western Fleming 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 Western Fleming 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 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 filling a paper containing personal information, Western Fleming shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Plant Statistics reported by Western Fleming in its Annual Report to the Commission for the Calendar Year Ending December 31, 2015 ("2015 Annual Report"), at page 62 of 71, and provide the following:

a. The 2015 Annual Report indicates that Western Fleming had a total of five tanks, with two of these tanks described as out of service. Identify the location of each tank that is out of service, state the storage capacity of the tank in gallons, and the reason the tank is out of service;

b. The Application includes a list that identifies, by name, three storage tanks. The Plant Statistics reported in the 2015 Annual Report identify each storage tank by assigning it a number. For each tank listed in the Application, identify the number assigned to that tank in the Plant Statistics reported in the 2015 Annual Report; and

c. State why Western Fleming is not utilizing the storage capacity of all five of its tanks listed in the 2015 Annual Report.

2. Refer to the Application, at page 2, which states that Western Fleming has nine water storage tanks in its system and provide the following:

a. Identify the location of each water storage tank, the date the tank was placed into service, the storage capacity of the tank in gallons, and the owner of the storage tank; and

b. For each water storage tank relied upon by Western Fleming for storage and which is not owned by Western Fleming, describe the agreement that permits Western Fleming to utilize the storage capacity of that tank. If there is a written agreement concerning Western Fleming's utilization of the storage capacity of the tank, provide a copy of the written agreement.

3. Refer to the Application, at page 3, which states that Robertson County Health Care has a storage facility. Describe the storage facility and state the usable capacity of the storage facility in gallons.

4. Refer to the Application, at page 4, which identifies "Greater Regional" as a water supplier to Western Fleming that has storage capacity or reserves storage capacity for the benefit of Western Fleming and provide the following:

a. Confirm that Greater Regional refers to the Greater Fleming County Regional Water Commission; and

b. Describe the storage capacity of Greater Regional, and for each facility of Greater Regional's storage capacity relied upon by Western Fleming state the location of the facility and the storage capacity of that facility.

5. Refer to the Application, at page 4, which references an attachment concerning an agreement or letter from Western Fleming's water supplier and provide a copy of the attachment.

6. Refer to the Application, at page 5, which states that Western Fleming is "planning on building a new elevated water tower when financially able, within next six years," and provide the following:

- a. Identify the location of the planned facility and its storage capacity;
- b. State the estimated total project cost for the planned facility; and
- c. Define "financially able" as that phrase is used in the Application.

7. Refer to the Order entered on November 3, 1997 in Case No. 97-427, *The Application of Western Fleming County Water District for a Deviation from the Requirements of 807 KAR 5:066, Section 4(4), Regarding Water Storage*, which granted Western Fleming a deviation from the requirements of 807 KAR 5:066, Section 4(4), and provide the following:

- a. State each storage facility and its corresponding capacity placed into service by Western Fleming since November 1, 1997; and
- b. State each storage facility and its corresponding capacity taken out of service by Western Fleming since November 1, 1997.



Talina R. Mathews
Executive Director
Public Service Commission
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DATED MAR 07 2017

cc: Parties of Record

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