## **PSC CASE NO. 2016-424**

#### TRANSMITTAL LETTER

**RECEIVED** 

**TO:** Talina R. Mathews

**Executive Director** 

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

APR 3 2017

Public Service Commission

**FROM:** Western Fleming County Water District

Patrick E. Price, Attorney

Suit, Price, Price & Ruark, PLLC

207 Court Square

Flemingsburg, KY 41041 Phone: 606-849-2338 Fax: 606-845-8771

Email: peprice@windstream.net

SUBJECT: Attached is Western Fleming County Water District's Answers to Commission

Staff's Request for Information to Western Fleming County Water District.

RECEIVED

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

APR 3 2017

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)	)	

# ANSWER TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

\* \* \*

Comes Western Fleming County Water District (hereinafter referred to as "WFCWD"), and for their answers to the Commissioner Staff's Request for Information and responds as follows:

## **QUESTION 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 2025 Annual Report; and
- c. State why Western Fleming is not utilizing the storage capacity of all five of its tanks listed it the 2015 Annual Report.

#### ANSWER:

a. WFCWD has a total of three (3) tanks out of service:

<u>Tank</u>	Capacity	Reason Out of Service
Clyde Thomas Tank Fairview Tank Brown Tank	unknown 100,000 gal. 92,000 gal.	Tank has been demolished  Tank leaks around foundation and has bullet holes  Tank is not tall enough to provide sufficient pressure

b.	<u>Tank</u>	Assigned Number	<u>Status</u>
	Clyde Thomas Tank	1	Out of Service
	Fairview Tank	2	Out of Service
	Brown Tank	3	Out of Service
	Pecks Ridge Elevated Tank	4	In Service
	Delaney Elevated Tank	5	In Service

c. WFCWD has sufficient storage with the 2-300,000 gallon tanks. Additional storage would only increase the likelihood of high TTHMs.

## **QUESTION 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.

## **ANSWER 2:**

This question was answered incorrectly. WFCWD only has two (2) water storage tanks in service.

a.	<u>Tank</u>	<u>Location</u>	<b>Capacity</b>	<u>Owner</u>
	Delaney Elev. Tank	Delaney Road	300,000 gal.	WFCWD
	Pecks Ridge Elev. Tank	Pecks Ridge Road	300,000 gal.	WFCWD

b. N/A. WFCWD does not rely on another entity for water storage.

#### **QUESTION 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.

#### **ANSWER 3:**

This question was answered incorrectly. The tank in question belongs to the Buffalo Trail Water Association and is not utilized by WFCWD.

## **QUESTION 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 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.

#### **ANSWER 4:**

This question was answered incorrectly. WFCWD does not rely on Greater Fleming County Regional Water Commission (hereinafter referred to as "GFCRWC") for water storage capacity.

## **QUESTION 5:**

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

#### **ANSWER 5:**

There is no known agreement or letter from GFCRWC.

#### **QUESTION 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. Sate the estimated total project cost for the planned facility; and
- c. Define "financially able" as that phrase is used in the Application.

#### **ANSWER 6:**

Currently, WFCWD's customer demand is approximately 375,000 gallons per day. Of this, approximately 100,000 gallons is purchased from GFCRWC and approximately 275,000 gallons is produced by WFCWD. With 600,000 gallons for storage, WFCWD has approximately 1.6 days of 38 hours of storage. This exceeds the 24 hour requirement. Therefore, WFCWD feels they have sufficient storage and has no plans to construct a water storage tank at this time.

## **QUESTION 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:

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

## **ANSWER 7:**

a.	<b>Tank</b>	<b>Capacity</b>
	Pecks Ridge Elevated Tank Delaney Elevated Tank	300,000 gal. 300,000 gal.
b.	<b>Tank</b>	<b>Capacity</b>
	Clyde Thomas Tank Fairview Tank Brown Tank	unknown 100,000 gal. 92,000 gal.

I have completed the answers to the Commission Staff's Request for Information, and to the best of my knowledge all the answers and information contained herein is true and correct.

VERNON BARTON, Chairman

DATE

These Answers to the Commission Staff's Request for Information was prepared under my direction and mailed to Talina R. Mathews, Executive Director, Public Service Commission, P.O. Box 615, Frankfort, KY 40602.

PATRICK E. PRICE

3.30-17

DATE

A copy of the foregoing Answer has been mailed to the following:

on 3-30-17

Western Fleming County Water District 1500 Ewing Road P.O. Box 16 Ewing, KY 41039 Western Fleming County Water District Attn: Vernon Barton, Chairman 1500 Ewing Road P.O. Box 16 Ewing, KY 41039

PATRICK E. PRICÈ

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<rkh/Pleadings/Answer-WFCWD>