

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
NORTHERN KENTUCKY WATER DISTRICT	)	CASE NO.
FOR A CERTIFICATE OF CONVENIENCE	)	2018-00413
AND NECESSITY FOR OLIVE/COX ROAD	)	
WATER MAIN REPLACEMENT PROJECT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO NORTHERN KENTUCKY WATER DISTRICT

Northern Kentucky Water District (Northern Kentucky District), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due on or before January 24, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. 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.

Northern Kentucky 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 Northern Kentucky 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. When filing a paper containing personal information, Northern Kentucky District 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 application at paragraph 5 in which Northern Kentucky District states that the project is in the public interest based on the need for replacement of the existing facilities. State and explain whether there is any alternative to replacing the line to mitigate the risk of future failure. If there were alternatives, explain why Northern Kentucky District chose to replace the line over the alternatives and provide any cost-benefit analysis supporting replacing the line over the alternatives.

2. Identify the portions of the existing line for which replacement is proposed that were identified as being a "high priority for replacement" as stated in the application

at paragraph 5. Explain why and how those portions of the line were identified as a high priority for replacement.

3. Refer to the application at paragraph 6 in which Northern Kentucky District relates \$251,734.20 of the costs of the project to “Contractor Cost Part A” (constructed in 2009).

a. Describe in detail the portions of the project included in Contractor Cost Part A;

b. Provide a breakdown of the costs included in Contractor Cost Part A;

c. State specifically when construction on those portions of the project included in Contractor Cost Part A began and when it was completed;

d. Explain in detail why the portions of the project included in Contractor Cost Part A were constructed prior to those portions included in Contractor Bid Part B and why Northern Kentucky District considers them to be part of the same project as opposed to a completely different project;

e. Identify the contractor(s) who performed work on the portions of the project included in Contractor Cost Part A and state whether the work of each such contractor was competitively bid;

f. State whether Northern Kentucky District is requesting a Certificate of Public Convenience and Necessity (CPCN) for the portions of the project included in Contractor Cost Part A, and explain every basis for Northern Kentucky District’s contention that the Commission can grant a CPCN for a project or a portion of a project that was completed prior to the request for a CPCN.

*For*   
Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED **JAN 18 2019**

cc: Parties of Record

Case No. 2018-00413

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