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December 6, 2021

Ms. Linda C. Bridwell, P.E.  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602-0615

RECEIVED

DEC 07 2021

PUBLIC SERVICE  
COMMISSION

**Re: Case No. 2019-00258**  
***Stuart I. Gross, Sr. v. Green River Valley Water District***

Dear Ms. Bridwell:

Enclosed for filing in the above-referenced matter is Green River Valley Water District's Response to Commission Staff's Second Request for Information.

Sincerely,

Stoll Keenon Ogden PLLC

A handwritten signature in blue ink that reads "Gerald E. Wuetcher".

Gerald E. Wuetcher

GEW  
Enclosure

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

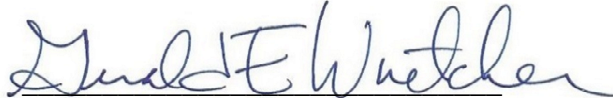
<b>STUART I. GROSS, SR.</b>	)	
	)	
<b>COMPLAINANT</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO. 2019-00258</b>
	)	
<b>GREEN RIVER VALLEY WATER DISTRICT</b>	)	
	)	
<b>DEFENDANT</b>	)	

**RESPONSE OF GREEN RIVER VALLEY WATER DISTRICT  
TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION**

Green River Valley Water District submits its Response to Commission Staff's Second Request for Information.

Dated: December 6, 2021

Respectfully submitted,



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*Counsel for Green River Valley Water District*

**CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 6, I certify that on December 6, 2021, a true and accurate copy of this Response was served by U.S. Mail, postage prepaid, on Stuart I. Gross, Sr., 3013 Leitchfield Road, Cecilia, Kentucky 42724 and 2931 Rocky Hill Road, Bonnieville, Kentucky 42713 and by electronic mail to Executive Director, Public Service Commission at PSCED@ky.gov.

  
*Counsel for Green River Valley Water District*

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>STUART I. GROSS, SR.</b>	)	
	)	
<b>COMPLAINANT</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO. 2019-00258</b>
	)	
<b>GREEN RIVER VALLEY WATER DISTRICT</b>	)	
	)	
<b>DEFENDANT</b>	)	


**RESPONSE OF**  
**GREEN RIVER VALLEY WATER DISTRICT**  
**TO**  
**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION**

**FILED: December 6, 2021**

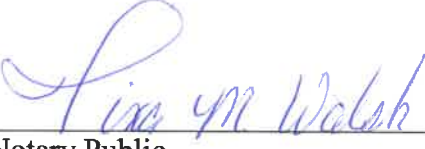
**VERIFICATION**

COMMONWEALTH OF KENTUCKY )  
  ) SS:  
COUNTY OF HART    )

The undersigned, David Paige, being duly sworn, deposes and states that he is the General Manager of Green River Valley Water District and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
David Paige  
General Manager  
Green River Valley Water District

Subscribed and sworn to before me, a Notary Public in and before said County and State,  
this 6 day of December 2021.

  
Notary Public

My Commission Expires: December 9, 2023

Notary ID: 636733

**GREEN RIVER VALLEY WATER DISTRICT**

**Response to Commission Staff's Second Request for Information  
Case No. 2019-00258**

Question No. 1

Responding Witness: David Paige

**Q-1. Refer to Green River Valley District's Motion to Dismiss filed on May 4, 2021.**

- a. Provide the date the water main went into service.**
- b. Provide the per square inch gauge for 2931 Baumgardner Road, Bonnieville, Kentucky, since the completion of the water main.**

A-1. a. April 26, 2021

- b. 85 psig. After the installation of the water main, Green River Water District monitored water pressure at the point of connection with Edmonson County Water District and at the point of service to 2931 Baumgardner Road with pressure recorders. Readings from these recorders indicated a consistent pressure of 85 psig.

**GREEN RIVER VALLEY WATER DISTRICT**

**Response to Commission Staff's Second Request for Information  
Case No. 2019-00258**

Question No. 2

Responding Witness: David Paige

- Q-2. Refer to Mr. Gross' Complaint filed on June 11, 2019. State whether Mr. Gross' property has been restored to the condition it was before the inline pump was placed into service as required by Green River Valley District's tariff.**
- A-2. With the exception of the inline pump, Green River Valley Water District has restored Mr. Gross's property to its prior condition. It has requested Mr. Gross's permission to remove the inline pump and pit, fill in the area where the pump and pit were located, and restore the property to its previous state. Upon obtaining his permission, it will proceed as quickly as possible to remove the pump and complete restoration efforts. Green River District will dispose of the pump in accordance with Mr. Gross's instructions.

**GREEN RIVER VALLEY WATER DISTRICT**

**Response to Commission Staff's Second Request for Information  
Case No. 2019-00258**

Question No. 3

Responding Witness: David Paige

- Q-3. Provide a statement concerning the water pressure level at 2931 Baumgardner Road, Bonnieville, Kentucky. Include in the response any documentation of low pressure at 2931 Baumgardner Road, Bonnieville, Kentucky, since the completion of the water main.**
- A-3. Since completion of the water main and its connection to Edmonson County Water District's delivery point, water pressure at the meter at 2931 Baumgardner Road has consistently been at 85 psig. As noted earlier, after the installation of the water main, Green River Water District monitored water pressure at the point of connection with Edmonson County Water District and at the point of service to 2931 Baumgardner Road with pressure recorders. Readings from these recorders indicated a consistent pressure of 85 psig. On two occasions, pressure decreased significantly due to water main breaks. These breaks occurred on May 5, 2021 and June 24, 2021 and resulted from heavy rainfalls that washed out the ground covering. Green River District promptly repaired the leaks and took steps to ensure that additional breaks or washing of the lines would not occur again. Green River District's records do not show any complaints from Mr. Gross regarding water pressure since June 24, 2021.