

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BREATHITT)	
COUNTY WATER DISTRICT FOR THE ISSUANCE)	
OF A CERTIFICATE OF PUBLIC CONVENIENCE)	CASE NO.
AND NECESSITY TO CONSTRUCT A WATER)	2020-00218
IMPROVEMENTS PROJECT PURSUANT TO THE)	
PROVISIONS OF KRS 278.020 AND 807 KAR)	
5:001)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO BREATHITT COUNTY WATER DISTRICT

Breathitt County Water District (Breathitt District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due within ten days of the date of this request. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Breathitt District SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

Breathitt District shall make timely amendment to any prior response if Breathitt District 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 Breathitt District fails or refuses to furnish all or part of the requested information, Breathitt District 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, Breathitt 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 Breathitt District's 2018 Annual Report, page 57. Total Other Water Used, line 21, lists 19,235,000 gallons, which equates to 17.76 percent of the water purchased by Breathitt District.²

² 2018 Annual Report, page 57, line 21 divided by line 4.

a. Provide a detailed explanation how the amounts were determined for each of the categories listed as Other Water Used.

b. Provide copies of all documents relied upon to support the amounts of water usage for each of the categories listed as Other Water Used.

c. In the event that any of the usage is estimated, provide the basis for the amount of the estimate.

d. Provide an explanation of Breathitt District's high volume of system use.

e. Provide a description of Breathitt District's efforts to reduce system use.

2. Provide a copies of the Preliminary and Final Engineering Reports that were prepared by Nesbitt Engineering, Inc. (Nesbitt) for Breathitt District's proposed waterline extension project. If Nesbitt did not prepare the engineering Reports, provide a detailed explanation as to why they were not prepared.

3. Provide the overhead construction cost for each item listed below for Breathitt District's proposed waterline extension project. Provide a detailed explanation if there are no overhead construction costs for the proposed project.

- a. Engineering Design
- b. Construction Inspection
- c. Legal
- d. Contingency



Kent A. Chandler
Acting Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JUL 20 2020

cc: Parties of Record

Case No. 2020-00218

*Breathitt County Water District
1137 Main Street, Suite 305
Jackson, KY 41339

*Bobby Thorpe, Jr.
Chairperson
Breathitt County Water District
1137 Main Street, Suite 305
Jackson, KY 41339

*Dawn Watts
P.O. Box 944
Jackson, KENTUCKY 41339