



GERALD WUETCHER
DIRECT DIAL: (859) 231-3017
DIRECT FAX: (859) 259-3517
gerald.wuetcher@skofirm.com

300 WEST VINE STREET
SUITE 2100
LEXINGTON, KY 40507-1801
MAIN: (859) 231-3000
FAX: (859) 253-1093

August 24, 2020

Kent A. Chandler, Esq.
Acting Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort, KY 40602-0615

RECEIVED

AUG 25 2020

PUBLIC SERVICE
COMMISSION

Re: Case No. 2019-00375
Tracey Kay Sanders v. Green River Valley Water District

Dear Mr. Chandler:

Enclosed for filing in the above-referenced case is Green River Valley Water District's Offer of Settlement. This letter and the enclosed document are true and accurate copies in paper medium of the electronic version of the documents that were emailed to the Public Service Commission this day.

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:

TRACY KAY SANDERS)	
)	
COMPLAINANT)	
)	
v.)	CASE NO. 2019-00375
)	
GREEN RIVER VALLEY WATER DISTRICT)	
)	
DEFENDANT)	

OFFER OF SETTLEMENT

Pursuant to 807 KAR 5:001, Section 21, Green River Valley Water District (“Green River District”) desires to satisfy the matters complained of and submits the following proposal to resolve those matters:

1. Green River District will construct a booster pump station near Bunnell Crossing Road near Munfordville, Kentucky and tie this booster pump station into the three-inch water main that serves Bunnell Crossing Road. The estimated cost of this booster stations is \$110,000. Upon completion of the proposed booster station, the Complainant and **all customers along Bunnell Crossing Road** will receive water service at a pressure between 45 pounds per square inch gauge (“psig”) and 50 psig without the use of an individual pump station on their property.

2. Schedule for Completion. Green River District has instructed its Consulting Engineering to prepare plans and specifications for the booster pump stations. The Kentucky Division of Water (“DOW”) must approve the plans and specifications. Green River District expects to submit the plans and specifications to DOW on or about September 15, 2020 and to receive DOW approval no later than October 15, 2020. Upon approval of the plans and

specifications, Green River District will publish a request for bids on the proposed construction pursuant to KRS 424.260. Green River District expects the construction of the booster pump station to begin in November 2020 and to be completed and installed no later than May 2021. The COVID-19 pandemic has disrupted some supply chains and created delays in the delivery of equipment. The delivery of the pump may take as long as 20 weeks after the order for the booster station has been issued to the selected vendor.

3. Public Service Commission approval of the proposed booster station is not required. As total cost of the proposed project is less than \$500,000, the project is exempted from the requirement for a certificate of public convenience and necessity. KRS 278.020(1)(a)3. Assuming that the project is not exempted under KRS 278.020(1)(a), it is an ordinary extension in the usual course of business. The project does not duplicate existing facilities, will not compete with the facilities of other utilities, or conflict with the existing certificates of other water utilities. The expected cost of the project represents less than 0.5 percent of Green River District's net utility plant and is not a sufficient capital outlay to materially affect the water district's existing financial condition or cause an increase in charges to its customers.

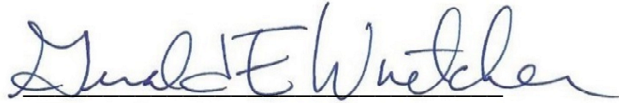
4. Green River District has not completed a hydraulic analysis reflecting the booster station's effects on water pressures. Such analysis must be prepared and submitted to the DOW with the project's plans and specifications. Green River District will file with the Commission this analysis and the plans and specifications at the same time an application for approval of the project is submitted to the DOW. Initial hydraulic calculations show that, upon completion of the booster pump station, water pressure to customers located along Bunnell Crossing will range between 45 psig and 50 psig at each customer's meter and that the use of an individual pump to ensure Public

Service Commission-mandated pressures will no longer be required or necessary. A map of the proposed location for the booster station pump is attached as Exhibit A.

WHEREFORE, Green River Valley Water District submits this Offer of Settlement and requests that the Complainant and the Public Service Commission accept it as satisfactory resolution of the matters complained of and that this proceeding be dismissed with prejudice.

Dated: August 24, 2020

Respectfully submitted,



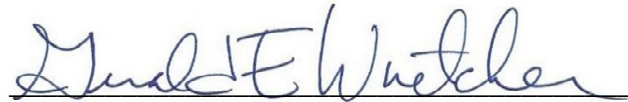
Patrick A. Ross
hrh@scrtc.com
Hensley & Ross Attorneys
P.O. Box 350
Horse Cave, Kentucky 42749
Telephone: (270) 786-2155
Fax: (270) 786-2118

Gerald E. Wuetcher
gerald.wuetcher@skofirm.com
Stoll Keenon Ogden PLLC
300 West Vine St. Suite 2100
Lexington, Kentucky 40507-1801
Telephone: (859) 231-3000
Fax: (859) 259-3517

Counsel for Green River Valley Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 6, I certify that a true and accurate copy of this Offer of Settlement was served by U.S. Mail, postage prepaid, Tracey Kay Sanders, 1134 Bunnell Crossing Road, Munfordville, Kentucky 42765 on August 24, 2020.



Counsel for Green River Valley Water District

EXHIBIT A

P-44

J-933

Proposed Bunnell Crossing Road Pump Station

"New" Horse Cave Tank

Flow Path

Bunnell Crossing Road Pump Station Hydraulic Model Map

Pipe Diameter	
Red	≤ 2
Orange	≤ 3
Yellow	≤ 4
Green	≤ 6
Light Green	≤ 8
Dark Green	≤ 10
Blue	≤ 12
Purple	≤ 16
Black	> 16

