

Kentucky Public Service Commission
P.O. Box 615
Frankfort, KY 40602

RECEIVED
SEP 19 2023
PUBLIC SERVICE
COMMISSION

September 14, 2023

Request For Intervention in Oldham County Water District Application for Rate Increase

I am Robert Jefferson, President of the Buckeye Trace Homeowners Association Board of Directors. Buckeye Trace is a subdivision in Oldham County KY. All of our residents are Oldham County Water District customers. The attached document provides details of our request to intervene in the pending Oldham County Water District Application for a rate increase. Our request is to apply a specific condition to any approval that the Kentucky Public Service Commission may grant pursuant to this rate increase application.

Thank you for your consideration of this request. My contact information is below.

Respectfully submitted



Robert Jefferson
President, Buckeye Trace Homeowners Association
11000 Buckeye Trace
Goshen, KY 40026

Email: [REDACTED]

Phone: [REDACTED]

Before the Public Service Commission of Kentucky

Request to Intervene in Oldham County Water District Application for Rate Increase

Summary

The Buckeye Trace Homeowners Association (BTHOA) respectfully submits this request to intervene in the application by the Oldham County Water District (OCWD) for a rate increase to the Kentucky Public Service Commission. The BTHOA is comprised of 33 residences in a subdivision in Oldham County, all of whom are customers of OCWD. Our request is that any grant for a rate increase must be made under the condition that OCWD commit to infrastructure improvements which ensure adequate water supply for firefighting and public safety purposes.

The Issue

In May 2020, there was a fatal house fire within the BTHOA subdivision. The primary fire protection provider for our surrounding area is the North Oldham Fire Department (NOFD). Subsequent to this tragedy, the BTHOA has undertaken efforts jointly with NOFD to advocate for measures that will improve firefighting capabilities in our area and potentially save lives and better protect property. Our partner in these efforts is the Chief of NOFD, Fire Chief Hewett Brown. The immediate issue at hand is that the far Western part of the OCWD service area is at the furthest geographical point from the source of water supply. Because we are at "the end of the line" from OCWD's water source in Westport KY, fire hydrants are essentially useless. Hydrant supply is quickly exhausted, and this means that water tankers are the only practical solution for fighting significant fires. Refilling water tankers at a site several miles away from our neighborhood and transversing a narrow hilly road proved to be a significant obstacle in our 2020 fire tragedy. This history is doomed to repeat itself without adequate water supply line infrastructure improvements.

Section 7.3 of Oldham County Subdivision Regulations dictates Fire Protection Standards that must be met for approval of new developments. The inadequate water supply in our geographical area falls far short of current standards, as many of our older subdivisions and homes were built prior to the current standard.

The Solution

After the 2020 fire, the BTHOA Board and NOFD Fire Chief Brown met with the CEO of OCWD, Russ Rose. Mr Rose acknowledged the safety issue that is present in our part of his service district. It was also recognized that other nearby customers, such as the

adjacent Old Taylor Place subdivision of several hundred homes and the Francis Parker School all face similar issues from inadequate water supply for firefighting. Mr Rose committed to an engineering study to map out the requirements to remediate this issue. The improvements were likely to include larger water lines to be laid parallel to Hwy 42 from an Eastern point of stronger water supply (such as Liberty Lane) out to the intersections feeding Old Taylor Place and all customers on North and South Buckeye Lane. While my understanding is that this engineering study has been initiated, I don't know if it has been completed. Other necessary steps such as easement acquisition and securing financing are possibly underway, but the BTHOA Board has not been able to receive a current status update. There have been no public meetings on this initiative, that I am aware of.

BTHOA Request

The BTHOA is not taking issue with the need for the rate request submitted by the OCWD. Our understanding is that their last rate increase was in 2009. We can appreciate the impact of inflation on their cost structure since that time. Our request is that any approval of OCWD rate increase be conditional. The condition that the BTHOA is requesting is that OCWD commit to a construction plan which will ensure that water supply to our area meet or exceed Section 7.3 Fire Protection Standards of Oldham County Subdivision Regulations. The timetable for the commencement and conclusion of this construction plan must be mutually agreed to by the BTHOA, the NOFD and the OCWD.

Respectfully submitted September 14, 2023



Robert Jefferson

President, Buckeye Trace Homeowners Association

Phone: [REDACTED]

Email: [REDACTED]

Address: 11000 Buckeye Trace

Goshen, KY 40026