

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF APPALACHIAN WASTE)	
CONTROL FOR AN ADJUSTMENT IN RATES)	
PURSUANT TO THE ALTERNATIVE RATE FILING)	CASE NO. 2007-00093
PROCEDURE FOR SMALL UTILITIES AND)	
REQUEST FOR INTERIM RELIEF)	

COMMISSION STAFF'S INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS TO
APPALACHIAN WASTE CONTROL

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Appalachian Waste Control file the original and 8 copies of the following information with the Commission within 20 days of this request, with a copy to all parties of record. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be under oath or, for representatives of a public or private corporation, a partnership, an association or a governmental agency, shall be accompanied by a signed certification of the preparer or 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.

Appalachian Waste Control shall make timely amendment to any prior response if it obtains information upon the basis of which it knows that the response was incorrect when made, or though correct when made, is now incorrect in any material respect. For

any request to which Appalachian Waste Control fails to furnish all or part of the requested information, Appalachian Waste Control shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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 provided for total company operations and jurisdictional operations, separately.

1. Refer to "Report on Financial Operations of Appalachian Waste Control." For each entry of "Administrative and legal" or "Billing, administrative, and legal" that appears under "Monthly Maintenance Costs," list and describe the services and materials provided for this charge. Where services are provided, state the number of hours worked and the hourly rate used. For each listed service or material, state whether the service or purchase of materials is recurring in nature. If the service or purchase is of a recurring nature, state how frequently the service or purchase will recur.

2. Refer to "Report on Financial Operations of Appalachian Waste Control." At "Costs And Expense" Appalachian Waste Control reports total expenses of \$59,066.27. At "Bond Money Collected," Appalachian Waste Control reports operating expenses of \$67,133.52. Reconcile the difference in total reported expenses. For each reconciling item, provide invoices that contain a complete description of the charges. For charges for professional services, provide a description of the service, the number of hours worked, and the hourly rates for the service. For charges for materials, describe the materials and the need for such materials. For each listed service or

material, state whether the service or purchase of materials is recurring in nature. If the service or purchase is of a recurring nature, state how frequently the service or purchase will recur.

3. Explain why the total collections for May and July are relatively low despite the assessment of a monthly rate of \$56.72.

4. Refer to "Report on Financial Operations of Appalachian Waste Control" at Exhibit A.

a. For each plant, identify the facility (e.g., digester, lagoon) that was pumped.

b. For each plant, state the number of gallons pumped from the plant.

c. State why 16 hours of pumping was required.

d. Describe the services and materials included in the rate of \$135 per hour.

e. Prestonsburg City Utilities Commission ("PCUC") charged 100 man-hours to spray down plants, repair air lines, make electrical repairs, replace pumps, and install walkways. For each of these tasks, state the number of man-hours required.

5. Refer to "Report on Financial Operations of Appalachian Waste Control" at Exhibit B.

a. For maintenance task performed on May 2, 2007, state the number of man-hours to perform that task.

b. State the sewage treatment plant(s) from which sludge was removed on May 2, 2007 and the amount of sludge removed from each plant.

c. Explain why one employee checked all of Appalachian Waste Control's plants at a cost of \$303.75 on May 12, 2007 and on May 19, 2007, but 4 employees were required to check all the plants on May 21, 2007 at a cost of \$2,160.

d. For each sewage treatment plant, state the amount of sludge removed from each plant on May 30, 2007.

6. Refer to "Report on Financial Operations of Appalachian Waste Control" at Exhibit C.

a. For each general maintenance task performed on June 1, 2007, state the number of hours devoted to that task.

b. Identify the sewage treatment plant from which PCUC removed sewage on June 12, 2007 and the amount of sludge removed.

c. On June 18, 2007, PCUC collected samples. State the type of testing being conducted and the frequency that such testing must be conducted at each sewage treatment plant.

d. For each general maintenance task performed on June 19, 2007, state the number of hours devoted to that task.

e. State the amount of sewage that PCUC removed on June 26, 2007 and the amount of sludge removed.

7. Refer to "Report on Financial Operations of Appalachian Waste Control" at Exhibit D.

a. For each general maintenance task performed on July 5, 2007, state the number of hours devoted to that task.

b. Identify the sewage treatment plant from which PCUC removed sewage on July 5, 2007 and the amount of sludge removed.

c. (1) State the purpose for which the Vac Truck was used on July 16, 2007.

(2) State, if the Vac Truck was used on July 16, 2007 for pumping sludge, the amount of sludge pumped.

d. Describe the engineering services provided on July 28, 2007 for the Neal Price and Preston Estates sewage treatment plants. Identify the firm or vendor providing these services and provide the vendor invoice submitted to PCUC for these services.

8. a. Describe how PCUC derived the hourly service charge fee of \$67.50.

b. PCUC assesses an hourly service charge of \$67.50 regardless of the service (e.g., tree removal, grass cutting, plant maintenance) provided. Explain why an hourly service charge of \$67.50 is appropriate for a service such as grass cutting.

9. For each sewage treatment plant that Appalachian Waste Control owns, state the amount of acreage surrounding the plant that must be maintained and mowed.

10. For each Appalachian Waste Control sewage treatment plant, state:

a. The number of gallons of sludge pumped from the plant since PCUC was retained to operate the plants.

b. The frequency that PCUC expects to remove sludge from the plant.

c. The average amount of sludge that is expected to be removed during each pumping.

d. The need for periodic sludge removal.

e. All mechanical deficiencies at the plant that cause or contribute to sludge accumulation.

f. Appalachian Waste Control's current plans to correct the deficiencies listed in Item 10(e), the cost of these corrective actions, and expected date when such actions will be taken.

11. State the order in which PCUC's personnel travel to the 5 Appalachian Waste Control sewage treatment plants when PCUC personnel inspect all plants in a single day. State the starting and ending point for these inspection visits and the distance in miles between each starting and stopping point on the inspection visit.

12. State whether PCUC performs routine maintenance services for any sewage treatment facilities on a routine basis. If yes, identify the facility and the fee(s) assessed for such service.

13. State whether Appalachian Waste Control or PCUC has solicited bids or requests for proposals from independent certified wastewater treatment plant operators to perform maintenance on any of the Appalachian Waste Control sewage treatment plants. If yes, provide the bids or requests for proposals and state the action taken on each bid or proposal. If no, explain why not.



Beth O'Donnell
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DATED: October 17, 2007

cc: Parties of Record