

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 SECOND SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
APPALACHIAN WASTE CONTROL

Appalachian Waste Control, pursuant to Administrative Regulation 807 KAR 5:001, is to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due 20 days from the date of this request. 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 answered under oath or, for representatives of a public or private corporation or a partnership or an association or a governmental agency, 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 responses if it 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 requests

to which Appalachian Waste Control fails or refuses 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 request 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.

1. Provide the Kentucky Pollutant Discharge Elimination System (“KPDES”) permit number for each of the five Appalachian Waste Control plants that are currently in effect and the date of expiration for each.

2. Provide the cost to renew the KPDES permit for each of the five Appalachian Waste Control plants.

3. Provide the term of the KPDES permits for each of the five Appalachian Waste Control plants.

4. a. State the name of the outside company performing effluent testing in accordance with the KPDES permit.

- b. For each treatment facility, state the frequency of outside testing; e.g., monthly, quarterly, or annually.

- c. Provide a copy of the most recent invoice paid for outside testing with the cost for each facility listed separately.

5. Refer to Appalachian Waste Control's Report on Financial Operations as submitted to the Commission on September 12, 2007. Provide the dates of the services performed by Prestonsburg City's Utilities Commission as detailed at Exhibit A.

6. Refer to Item 7(d) of Appalachian Waste Control's Responses to Commission Staff's Interrogatories and Requests for Production of Documents dated October 17, 2007.

a. Provide the engineering reports.

b. State the "functional plant" to which Neil Price and Preston Estates will be connected.

c. State the anticipated date the package treatment facilities at Neil Price and Preston Estates will be taken out of service and connected to the "functional plant."

d. If not already provided in the engineering reports supplied in response to Item 6(a) above, provide the cost estimates, in detail, to connect each of these facilities to a "functional plant."

e. Provide all solicited bids to perform these connections.

7. Refer to Item 8(a) of Appalachian Waste Control's Responses to Commission Staff's Interrogatories and Requests for Production of Documents dated October 17, 2007.

a. Provide the calculation of \$67.50 per hour based upon the information given here of \$15 per hour per 2 man team/\$20 per hour for utility vehicle.

b. Provide a description of the "utility vehicle" for which \$20 per hour is charged.

8. Refer to Item 8(b) of Appalachian Waste Control's Responses to Commission Staff's Interrogatories and Requests for Production of Documents dated October 17, 2007. This response is non-responsive. Explain why an hourly service charge of \$67.50 is appropriate for all services provided to Appalachian Waste Control whether the service is for grass cutting or a technical aspect of treatment facility operations requiring a certified operator.

9. The following schedules were developed from the information provided at Exhibits B, C and D of the Report on Financial Operations of Appalachian Waste Control filed with the Commission on September 12, 2007. Each schedule indicates a date and total hours billed by Prestonsburg City's Utilities Commission for services provided on that date. On these schedules, indicate the number of hours charged to each treatment plant facility for each service listed. The hours indicated should total the total hours shown on the schedule.

5/2/2007		Preston	Richmond	Neil		Paradise	Total
		Estates	Hills	Price	Burkshire	Valley	Hours
	Yard Care						
	Sludge Return						
	C12 Tablets						
	Sludge Removal						
	Odor Control						
	Repair Air Line						
	Total Hours						32

5/18/2007		Preston	Richmond	Neil		Paradise	Total
		Estates	Hills	Price	Burkshire	Valley	Hours
	Repairs						
	Check Plants						
	Total Hours						16

5/21/2007	Preston Estates	Richmond Hills	Neil Price	Burkshire	Paradise Valley	Total Hours
Repairs						
Check Plants						
Total Hours						32

5/30/2007	Preston Estates	Richmond Hills	Neil Price	Burkshire	Paradise Valley	Total Hours
Repairs						
Check Plants						
Sludge Removal						
Total Hours						14

6/1/2007	Preston Estates	Richmond Hills	Neil Price	Burkshire	Paradise Valley	Total Hours
Yard Care						
Sludge Return						
C12 Tablets						
Sludge Removal						
Odor Control						
Total Hours						12

6/7/2007	Preston Estates	Richmond Hills	Neil Price	Burkshire	Paradise Valley	Total Hours
Weed Killer						
Total Hours						18

6/12/2007	Preston Estates	Richmond Hills	Neil Price	Burkshire	Paradise Valley	Total Hours
Repairs						
Sludge Removal						
Total Hours						12

6/13/2007	Preston Estates	Richmond Hills	Neil Price	Burkshire	Paradise Valley	Total Hours
Repairs						
Total Hours						5

6/14/2007	Preston Estates	Richmond Hills	Neil Price	Burkshire	Paradise Valley	Total Hours
Repairs						
Total Hours						3

6/19/2007	Preston Estates	Richmond Hills	Neil Price	Burkshire	Paradise Valley	Total Hours
Grease Removal						
Sludge Removal						
C12 Tablets						
Total Hours						4

6/22/2007	Preston Estates	Richmond Hills	Neil Price	Burkshire	Paradise Valley	Total Hours
Repairs						
Grease Removal						
C12 Tablets						
Total Hours						4

7/5/2007	Preston Estates	Richmond Hills	Neil Price	Burkshire	Paradise Valley	Total Hours
Yard Care						
Sludge Return						
C12 Tablets						
Sludge Removal						
Odor Control						
Grease Removal						
Total Hours						10

10. For each Prestonsburg City's Utilities Commission field employee performing services to Appalachian Waste Control, state the employee's: (1) Name, (2) Job Title, (3) Hourly Pay Rate, and (4) Monthly Health, Life, and Other Insurance Premiums paid by the employer, excluding the amounts paid by the employee.

11. Refer to Exhibits C and D of the Report on Financial Operations of Appalachian Waste Control filed with the Commission on September 12, 2007. Provide

the gallons of sludge removed from each treatment facility on June 1, 2007, June 19, 2007, and July 17, 2007. State each treatment facility separately.

12. Refer to Exhibits B, C and D of the Report on Financial Operations of Appalachian Waste Control filed with the Commission on September 12, 2007.

a. State why some sludge hauling is stated in gallons while others are stated in pounds.

b. Is the sludge hauling stated in pounds performed in the same manner as that stated in gallons? Explain.

c. The following summarizes reported sludge removal for the dates indicated. The sludge removed on these dates is stated in pounds. Restate the sludge removed in gallons.

	Preston Estates	Richmond Hills	Neil Price	Burkshire	Pardise Valley
5/2/2007	1,600			1,600	1,400
5/30/2007	1,200	1,600	400	1,600	1,000
6/26/2007					1,000
7/5/2007				500	500

13. Refer to Exhibit C of the Report on Financial Operations of Appalachian Waste Control filed with the Commission on September 12, 2007. State specifically where weed killer was applied on June 7, 2007. The response should include the name of the treatment plant and the area of each treatment plant being treated.

14. Refer to Item 4(d) of Appalachian Waste Control's Responses to Commission Staff's Interrogatories and Requests for Production of Documents dated October 17, 2007. This response refers to a "pump truck."

a. Provide a description of this "pump truck" that includes its capacity.

b. Is this “pump truck” the same truck as listed as the “Vac-Truck” in the Report on Financial Operations of Appalachian Waste Control filed with the Commission on September 12, 2007 at Exhibit C, page 2 of 3 and Exhibit D, page 2 of 2? If no, provide a description of the “Vac-Truck.”

15. Refer to Exhibit D, page 2 of 2 of the Report on Financial Operations of Appalachian Waste Control filed with the Commission on September 12, 2007. There is a charge included under Materials/Equipment of \$840 for disposal of 4,000 gallons of sludge.

a. Who was paid this \$840 fee?

b. There are numerous entries for sludge removal at Exhibits A, B and C of this report with no itemized charge for sludge disposal. Explain why there is a separate charge at Exhibit D.

16. Refer to Item 10(a) of Appalachian Waste Control’s Responses to Commission Staff’s Interrogatories and Requests for Production of Documents dated October 17, 2007. Total sludge removed from each facility since Prestonsburg City’s Utilities Commission took over operations is stated at:

Preston Estates	5,000 gallons	Burkshire	2,500 gallons
Richmond Hills	5,000 gallons	Paradise Valley	7,000 gallons
Neil Price	3,400 gallons		

a. Reconcile the amounts above to those included in the table below which were taken from Exhibits A, B, C and D of the Report on Financial Operations of Appalachian Waste Control filed with the Commission on September 12, 2007.



Sludge Removal	Preston Estates		Richmond Hills		Neil Price		Burkshire		Paradise Valley	
	Gallons	lbs	Gallons	lbs	Gallons	lbs	Gallons	lbs	Gallons	lbs
Appendix A Start-Up Costs	5,000		5,000		2,500		2,500		2,400	
5/2/2007		1,600					1,600			1,400
5/30/2007		1,200		1,600		400	1,600			1,000
6/1/2007	Unknown at this time.									
6/12/2007					900				1,500	
6/19/2007	Unknown at this time									
6/26/2007										1,000
7/5/2007							500			500
7/16/2007									1,500	
7/17/2007	Unknown at this time									
Total	5,000	2,800	5,000	1,600	3,400	400	2,500	3,700	5,400	3,900

b. As represented by the Report on Financial Operations of Appalachian Waste Control submitted to the Commission on September 12, 2007, in just over 3 months of operating Appalachian Waste Control, the Prestonsburg City's Utilities Commission has performed a large amount of sludge removal relative to other sewer operations reviewed by the Commission. Will the level of sludge removal for the historic 3 month period shown in the financial report continue in the future? Explain.

c. For August, September, October, and November 2007, state separately the amount of sludge removed from each of Appalachian Waste Control's treatment facilities. This summary shall separate sludge hauling by plant, date removed, volume removed and amount of sludge removal charges.

d. Are there any physical attributes or conditions existing at any of Appalachian Waste Control's five treatment facilities or within the contents of the sludge removed from those facilities that prevent an outside, independent septic pumping service from performing these services? If yes, explain in full detail.

e. Provide all bids from independent contractors received by Appalachian Waste Control or Prestonsburg City's Utilities Commission for sludge pumping and removal from Appalachian Waste Controls' treatment facilities.

17. For all sludge removal stated in response to Items 11 and 16(c) and the removal included in the chart at Item 16(a) of this request, provide a vendor invoice from the recipient of the sludge for payment of disposal and treatment.

18. For August, September, October, and November 2007, provide a summary, by month, of daily fees charged to Appalachian Waste Control by Prestonsburg City's Utilities Commission for services provided. These monthly summaries shall be in the same format as provided in Exhibits B, C, and D of the Report on Financial Operations of Appalachian Waste Control submitted to the Commission on September 12, 2007.

19. Using the headings shown in the sample chart below, create monthly charts for August, September, October, and November 2007 for each treatment facility of Appalachian Waste Control. Complete these charts by stating the hours charged for each of the duties shown therein and state the date each service was performed. Provide a detailed description for any hours reported as "Other." The total hours for each month should be directly traceable to the total hours billed on the summaries provided in response to Item 18 of this request.

Name of Facility	Yard Care	Sludge Removal	C12 Tablets	Order Control	Repairs	Sample Collections	Grease Removal	Check Plants	Other	Total Hours	Hourly Rate	Charge
8/XX/07		4.00		1.00						5.00	67.50	337.50
8/XX/07	0.50	2.00						4.50		7.00	67.50	472.50
Total August	0.50	2.00	4.00	-	1.00	-	-	-	4.50	12.00		810.00



Beth O'Donnell  
 Executive Director  
 Public Service Commission  
 P. O. Box 615  
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DATED: December 17, 2007

cc: Parties of Record