### COMMONWEALTH OF KENTUCKY

#### BEFORE THE PUBLIC SERVICE COMMISSION

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PROPOSED FILING OF GREEN RIVER	)	
VALLEY WATER DISTRICT TO AMEND ITS	)	CASE NO. 2020-00026
TARIFF	)	

# RESPONSE OF GREEN RIVER VALLEY WATER DISTRICT TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION

Green River Valley submits its Response to Commission Staff's First Request for Information.

Dated: May 6, 2020 Respectfully submitted,

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

Katelyn L. Brown

Stoll Keenon Ogden PLLC

500 West Jefferson Street, Suite 2000

Louisville, Kentucky 40202

Telephone: (502) 568-5711

Fax: (502) 333-6099

katelyn.brown@skofirm.com

Counsel for Green River Valley Water District

#### **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that Green River Valley Water District's electronic filing of this Response is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Public Service Commission on May 6, 2020; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that within 30 days following the end of the state of emergency announced in Executive Order 2020-215 this Response in paper medium will be delivered to the Public Service Commission.

Counsel for Green River Valley Water District

## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

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	1116	VIALLEL	. ()  :

PROPOSED FILING OF GREEN RIVER	)	
VALLEY WATER DISTRICT TO AMEND ITS	)	CASE NO. 2020-00026
TARIFF	)	

### **RESPONSE OF**

## GREEN RIVER VALLEY WATER DISTRICT

TO

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION

FILED: May 6, 2020

## **VERIFICATION**

) SS:

)

COMMONWEALTH OF KENTUCKY )

**COUNTY OF HART** 

Manager of Green River Valley Water Distr	g duly sworn, deposes and states that he is the rict and that he has personal knowledge of the identified as the witness, and the answers cost information, knowledge and belief.	matters
	David Paige General Manager Green River Valley Water District	
Subscribed and sworn to before me, this _5th _ day of May 2020.	a Notary Public in and before said County an	nd State,
	Emily Dogman (S	SEAL)
	My Commission Expires: January 17, 207	14

Notary ID: KYNP940

### **VERIFICATION**

COMMONWEALTH OF KENTUCKY	)
	) SS:
COUNTY OF FRANKLIN	)

The undersigned, Vaughn Williams, being duly sworn, deposes and states that he is the President of Kenvirons, Inc., that he serves as a consulting engineer to Green River Valley Water District, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Vaughn Williams, P.E.

President Kenvirons, Inc.

Subscribed and sworn to before me, a Notary Public in and before said County and State, this day of May 2020.

Notary Public (SEAL)

My Commission Expires: 1 - 7 - 23

Notary ID: <u>(134996</u>

# Response to Commission Staff's Second Request for Information Case No. 2020-00026

Question No. 1

Responding Witnesses: David Paige/Vaughn Williams

- Q-1. Refer to Green River Valley District's response to Staff's First Request for Information (Staff's First Request), Item 1. For those customers with low pressure complaints, provide a list of the complaints that have not been resolved. Include an explanation of the individual problem and the action being taken by the Green River Valley District in an attempt to resolve the issue.
- A-1. All complaints related to low water pressure contained in Item 1 have been resolved except for those involving the following addresses: 1114 Bunnell Crossing Road, 1134 Bunnell Crossing Road, and 1165 Bunnell Crossing Road. As with the other areas experiencing low pressure, the topography along Bunnell Crossing Road is simply too high in elevation for the water district's water storage tanks to provide adequate pressure by gravity. Green River Valley Water District plans to install a booster pump station to increase the pressure along Bunnell Crossing Road.

# Response to Commission Staff's Second Request for Information Case No. 2020-00026

Question No. 2

Responding Witnesses: David Paige/Vaughn Williams

- Q-2. Refer to Green River Valley District's response to Staff's First Request, Item 5, Attachment 5.a. The four properties on Bunnell Crossing Road identified on the map are served by the same line and have similar elevations. Explain why the Sanders property has an individual pump while McBride, Logsdon, and Mathews properties do not.
- A-2. Green River Valley Water District installed a pump at Sanders Property in 1996 shortly after the water line serving that road was constructed. It did not receive a complaint regarding pressure at the Logsdon and McBride properties until October 4, 2019 and November 18, 2019. Shortly before receiving the Logsdon complaint, the Commission's Consumer Division advised Green River Valley Water District's General Manager that the water district's tariff should be revised to reflect its policy regarding the installation of water pumps for customers experiencing low water pressure. When the complaints were received, the water district was revising its tariff to include the revisions that are under review in this proceeding. Green River Valley Water District was awaiting the Commission's decision on this revision before installing a pump on each property. Green River Water District has not yet received a complaint regarding service to the Mathews property.

# Response to Commission Staff's Second Request for Information Case No. 2020-00026

Question No. 3

Responding Witness: Vaughn Williams

- Q-3. Refer to Green River Valley District's response to Staff's First Request, Item 5, Attachment 5.b. Confirm that the Gross/Conahan property at 2931 Baumgardner is served by the Bonnieville tank. If this cannot be confirmed, provide the tank that serves the Gross/Conahan property. If confirmed, provide a detailed explanation why this residence is experiencing low pressure problems when it is located near a storage tank.
- A-3. The Bonnieville Tank serves the Gross/Conahan property at 2931 Baumgardner Road. It is a common and erroneous belief that customers located near a water storage tank will have good pressure. The pressure at any location in the distribution system is established by several factors with the primary influences being; elevation difference between the tank and residence, flowrate through the connecting pipe, size of the pipe, and distance from the tank. If the water in the pipe is not moving, or moving at a relatively slow velocity, then the greater the difference in elevation between the tank and residence relates to proportionately greater increase in pressure. The Gross/Conahan property is the highest elevation being served by the Bonnieville Tank and it also experiences the lowest pressure.

# Response to Commission Staff's First Request for Information Case No. 2020-00026

Question No. 4

Responding Witness: David Paige

- Q-4. Refer to Green River Valley District's response to Staff's First Request, Item 9. Three of the six customers listed in the response have previously been identified as having individual booster pumps. Provide all plans or actions Green River Valley District has taken to resolve the low-pressure issue for the other three customers listed in the response.
- A-4. Green River Valley Water District intends to install a booster pump station to increase the pressure along Bunnell Crossing Road. It estimates that installation will be completed within the next five months.

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# Response to Commission Staff's First Request for Information Case No. 2020-00026

Question No. 5

Responding Witness: David Paige

- Q-5. Refer to Green River Valley District proposed tariff, original sheet 26, section AG.1., New Customers.
  - a. Confirm that Green River Valley District's policy is to maintain newly installed individual pumps for one year after the installation.
  - b. Explain whether Green River Valley District believes language should be added to the tariff section to reflect the policy.
  - c. Provide Green Valley District's proposed revised language if the current language in the tariff does not reflect Green River Valley District's policies
- A-5. a. Green River Valley Water District's current policy is to assume responsibility for the maintenance of any individual pump that it installs for a period of one year following the pump's installation.
  - b. Green River Valley Water District agrees that its tariff should be revised to reflect its current policy.
  - c. See attached tariff sheet

	AREA Hart, Barren, Larue, Green & Metcalfe
	PSC KY NO. 1
	Original SHEET NO. 26
Green River Valley Water District (NAME OF UTILITY)	CANCELLING PSC KY NOSHEET NO
AG Rules and Regulations for Low Pressure Areas	

#### 1. **New Customers**

The water district will not set a meter for any new customer if the utility cannot maintain water pressure at or above 30 PSI at the water meter unless the prospective customer agrees to install and maintain at the customer's own expense a pump that will provide the customer with the minimum water pressure required by the Public Service Commission.

#### 2. **Existing Customers**

For any customer connected to the water district's distribution system prior to February 1, 2020, whose water pressure cannot be maintained at or above the minimum limit established by the Public Service Commission by any other means, the water district shall install on a one-time basis at its expense an individual pressure pump to serve the customer's property and shall be responsible for the maintenance of the installed pump for one year following the installation of the pump.

DATE OF ISSUE	December 18, 2019
	MONTH / DATE / YEAR
DATE EFFECTIV	/EFebruary 1, 2020
	MONTH / DATE / YEAR
ISSUED BY	/s/David Paige
	SIGNATURE OF OFFICER
TITLE	General Manager
BY AUTHORITY (	OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO.	DATED

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