

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

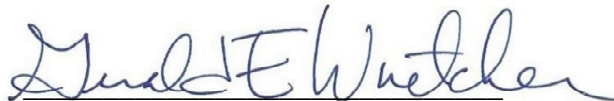
**PROPOSED FILING OF GREEN RIVER )  
VALLEY WATER DISTRICT TO AMEND ITS ) CASE NO. 2020-00026  
TARIFF )**

**RESPONSE OF GREEN RIVER VALLEY WATER DISTRICT  
TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION**

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

Dated: May 22, 2020

Respectfully submitted,



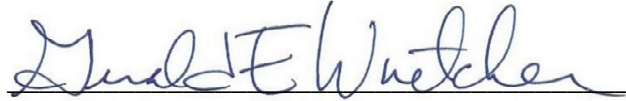
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*Counsel for Green River Valley Water District*

## 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 22, 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.

A handwritten signature in blue ink that reads "Gerald E. Wetcher". The signature is written in a cursive style with a horizontal line underneath the name.

*Counsel for Green River Valley Water District*

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**PROPOSED FILING OF GREEN RIVER            )**  
**VALLEY WATER DISTRICT TO AMEND ITS    ) CASE NO. 2020-00026**  
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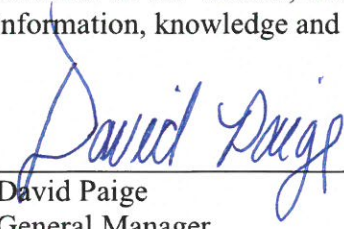
**RESPONSE OF**  
**GREEN RIVER VALLEY WATER DISTRICT**  
**TO**  
**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION**

**FILED: May 22, 2020**


VERIFICATION

COMMONWEALTH OF KENTUCKY   )  
  ) SS:  
COUNTY OF HART                                )

The undersigned, David Paige, being duly sworn, deposes and states that he is the General Manager of 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.

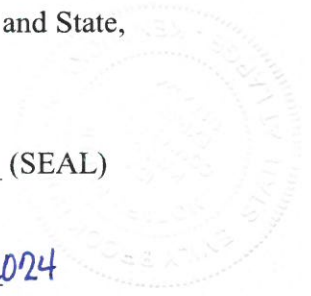
  
\_\_\_\_\_  
David Paige  
General Manager  
Green River Valley Water District

Subscribed and sworn to before me, a Notary Public in and before said County and State,  
this 22<sup>nd</sup> day of May 2020.

  
\_\_\_\_\_  
Notary Public   (SEAL)

My Commission Expires: January 17, 2024

Notary ID: KYNP960



**GREEN RIVER VALLEY WATER DISTRICT**

**Response to Commission Staff's Third Request for Information  
Case No. 2020-00026**

Question No. 1

Responding Witnesses: David Paige

- Q-1. Refer to Green River Valley District's Response to Commission Staff's First Request for Information (Response to Staff's First Request), Item 2. Provide the amount billed to each customer for the purchase, installation, maintenance, or any other cost associated with individual pumps.**
- A-1. As of this date, Green River Valley Water District has not billed any current or previous customer for the purchase, installation, maintenance, or other costs related to an individual pump.

**GREEN RIVER VALLEY WATER DISTRICT**

**Response to Commission Staff's Third Request for Information  
Case No. 2020-00026**

Question No. 2

Responding Witnesses: David Paige

- Q-2. Provide the names, addresses, and amount billed for purchase, installation, maintenance, or other cost associated with an individual pump for any other current or previous customer of Green River Valley District.**
- A-2. See response to Question 1.

## GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 3

Responding Witness: Legal Counsel

**Q-3. Provide the legal basis for requiring customers to incur extra costs for equipment necessary to meet the minimum standards of 807 KAR 5:066, Section 5(1).**

A-3. KRS 278.030 provides that a utility may place reasonable conditions upon the provision of service. Where isolated spots of low pressure exist within a water utility's distribution system that cannot be remedied without significant expenditure and such expenditures might adversely affect the rates without benefiting most customers, placing the burden on the individual applying for service to obtain and maintain the equipment necessary to meet minimum pressure requirements is appropriate and reasonable. The Commission has allowed numerous water utilities to require customers to install at the customer's own expense pressure regulators to address pressure issues.<sup>1</sup> It has permitted water utilities to refuse to set meters at any point that does not deliver 30 pounds per square inch at the meter site.<sup>2</sup> In such setting, it is not inappropriate or unreasonable for the utility to agree to provide service only if the applicant agrees to assume responsibility for the pumping equipment designed to enable sufficient pressure at the metering site as a condition for receiving service.

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<sup>1</sup> See, e.g., Bath County Water District Tariff, P.S.C.KY. No. 1, Original Sheet 36 (effective Sep. 15, 2003); Fleming County Water Association Tariff, P.S.C.KY. No. 1, Original Sheet 27 (effective Dec. 19, 2019); Ohio County Water District Tariff, P.S.C.KY. No. 1, Original Sheet 35 (effective Feb. 26, 2001);

<sup>2</sup> See, e.g., Cannonsburg Water District Tariff, P.S.C.KY. No. 1, Original Sheet 37 (effective Oct. 17, 2003); Cumberland Falls High Water District Tariff, P.S.C. No. 4, Revised Sheet 4 (effective Nov. 17, 2000); Garrison-Quincy-Ky-O-Heights Water District Tariff, P.S.C.KY. No. 1, Original Sheet 31 (effective July 17, 2002).