COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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

Green River Valley Water District submits its Response to Commission Staff's Fifth Request for Information.

Dated: August 24, 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 August 24, 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

In the Matter of:

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

RESPONSE OF

GREEN RIVER VALLEY WATER DISTRICT

TO

COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION

FILED: August 24, 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 24th day of August 2020.

Notary Public

My Commission Expires: January 17, 2024

Notary ID: KYNP960

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) **SS:**
COUNTY OF FRANKLIN)

The undersigned, R. Vaughn Williams, being duly sworn, deposes and states that he is the President of Kenvirons, Inc., is a licensed professional engineer in the state of Kentucky 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.

R. Vaughn Williams

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 24 day of August 2020.

Notary Public

My Commission Expires: 11-7-23

Notary ID: 0349960

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 1

Responding Witness: David Paige

Q-1. Provide an updated response to Commission Staff's First Request for Information (Staff's First Request), Item 1. Provide a copy of all written complaints received by Green River Valley District from January 22, 2020, to the present. If an investigation was conducted by Green River Valley District in relation to a complaint, provide a copy of all documentation in relation to the investigation, including Green River Valley District's findings in the investigation

A-1. Green River Valley Water District has not received any written complaints regarding low water pressure since submitting its response to Commission Staff's First Request for Information.

GREEN RIVER VALLEY WATER DISTRICT

Response to Commission Staff's Fifth Request for Information
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Question No. 2

Responding Witness: David Paige

Q-2. Refer to Green River Valley District's Response to Staff's First Request, Item 2. Provide all information available to Green River Valley District concerning the individual pump located at Mr. John McBride's residence located at 1114 Bunnell Crossing Road, Munfordville, Kentucky.

A-2. Green River Valley Water District has no information regarding the pump located at 1114 Bunnell Crossing Road, Munfordville, Kentucky. Green River Valley Water District learned of the existence of a pump at that address through the complaint made to the Public Service Commission's Consumer Service Branch.

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 3

Responding Witnesses: David Paige/Vaughn Williams

Q-3. Refer to Response to Staff's First Request, Item 2a.

a. Confirm the pump installed at 2931 Baumgardner Road, Bonnieville, Kentucky, in August 2017 was purchased and installed by Green River Valley District.

b. State whether the pump installed at 2931 Baumgardner Road was installed in Green River Valley District's system at a point before the meter at this location or after the meter at this location.

c. Explain Green River Valley District's decision to place the pump at the location on the system where it was installed.

d. If the pump was placed at a point after the meter at this location, state what alternative action would have been necessary for Green River Valley District to deliver 30 psi at the meter, if the pump had not been placed.

e. Provide a description of the individual pump installed by Green River Valley District, including the size, costs, and expected useful life.

A-3. a. In August 2017, Green River Valley Water District contracted with a local plumber to purchase and install a pump at 2931 Baumgardner Road, Bonnieville, Kentucky.

b. The pump was installed after the metering point.

c. Installing a pump before the metering point would have required the use of a larger and more expensive pump. Green River Valley Water District estimates that the cost to purchase and install a pump on its public water main be approximately $110,000. Given that the issue at that time involved only one customer, the more cost-effective approach was to install an individual pump after the metering point that would remedy the customer's low-pressure problems.

Moreover, Kentucky Division of Water regulations incorporate the provisions of *Recommended Standards for Water Works*, 12th Edition. The *Recommended Standards for Water Works* does not permit the connection to a public water supply main of a private booster pump for individual residential service. Kentucky Division of Water's regulatory authority, however, ends at the metering point. The International Plumbing Code and the Kentucky Plumbing Code govern installations after the metering point and permit the installation of such pumps.

d. See response to Item 3c.

e. Green River Valley Water District's records indicate that the cost of the pump and installation was $2,500. Green River Valley has no specific information regarding the size or useful life of the installed pump. It deferred to the licensed plumber's judgment and experience regarding the size and type of pump to install. Any information regarding the pump's specifications and warranty was likely provided to the customer who received the pump. Based upon a brief review of available pumps, Green River Valley Water District estimates that the useful life of the pump was between five and ten years.

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 4

Responding Witnesses: David Paige/Vaughn Williams

Q-4. Refer to Response to Staff's First Request, Item 2a.

a. Confirm the pump installed at 1134 Bunnell Crossing Road, Munfordville, Kentucky in 1996 was purchased and installed by Green River Valley District.

b. State whether the pump installed at 1134 Bunnell Crossing Road was installed in Green River Valley District's system at a point before the meter at this location or after the meter at this location.

c. Explain Green River Valley District's decision to place the pump at the location on the system where it was installed.

d. If the pump was placed at a point after the meter at this location, state what alternative action would have been necessary for Green River Valley District to deliver 30 psi at the meter, if the pump had not been placed.

e. Provide a description of the individual pump installed by Green River Valley District, including the size, costs, and expected useful life.

A-4. a. In 1996 Green River Valley Water District caused an individual pump to be installed at 1134 Bunnell Crossing Road, Munfordville, Kentucky. There are no available records to determine who installed the pump. While it is reasonable to assume that a licensed plumber was retained to install the pump, Green River Valley Water District has been unable to locate any records regarding the pump's installation. It cannot confirm whether Green River Valley Water District retained the licensed plumber, or the customer retained the licensed plumber and was then reimbursed.

b. The pump was installed after the metering point.

c. At the time of the pump's installation, existing Kentucky Division of Water regulations incorporated the provisions of *Recommended Standards for Water Works*. The *Recommended Standards for Water Works* did not permit the connection to a public water supply main of a private booster pump for individual residential service. Kentucky Division of Water's regulatory authority ends at the metering point. The International Plumbing Code and the Kentucky Plumbing Code govern installations after the metering point and permit the installation of such pumps.

d. Green River Valley Water District's records do not reflect the options considered. Installing a pump before the metering point, however, would have required the use of a larger and more expensive pump. Green River Valley Water District's records do not indicate the cost of such pump, but it would have been considerably higher than the cost of an individual pump. Given that the issue at that time involved only one customer, the more cost-effective approach was to install an individual pump after the metering point that would remedy the customer's low-pressure problems.

e. Green River Valley Water District was unable to locate any records regarding the installed pump's purchase and installation and is unable to provide the requested information.

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 5

Responding Witnesses: David Paige/Vaughn Williams

Q-5. Refer to Response to Staff's First Request, Item 2a.

a. Confirm the pump installed at 1896 Bolton School Road, Bonnieville, Kentucky on July 8, 2018 was purchased and installed by Green River Valley District.

b. State whether the pump installed at 1896 Bolton School Road was installed in Green River Valley District's system at a point before the meter at this location or after the meter at this location.

c. Explain Green River Valley District's decision to place the pump at the location on the system where it was installed.

d. If the pump was placed at a point after the meter at this location, state what alternative action would have been necessary for Green River Valley District to deliver 30 psi at the meter, if the pump had not been placed.

e. Provide a description of the individual pump installed by Green River Valley District, including the size, costs, and expected useful life.

A-5. a. On July 8, 2018, Mark Lindsey Plumbing LLC installed a pump at 1896 Bolton School Road, Bonnieville, Kentucky. Green River Valley Water District contracted with Mark Lindsey Plumbing LLC for the purchase and installation of the pump.

b. The pump was installed after the metering point.

c. Installing a pump before the metering point would have required the use of a larger and more expensive pump. Green River Valley Water District estimates that the cost to purchase and install a pump on its public water main be approximately $110,000. Given that the issue at that time involved only one customer, the more cost-effective approach was to install an individual pump after the metering point that would remedy the customer's low-pressure problems.

Moreover, Kentucky Division of Water regulations incorporate the provisions of Recommended Standards for Water Works, 12th Edition. The Recommended Standards for Water Works does not permit the connection to a public water supply main of a private booster pump for individual residential service. Kentucky Division of Water's regulatory authority ends at the metering point. The

International Plumbing Code and the Kentucky Plumbing Code govern installations after the metering point and permit the installation of such pumps.

d. See response to Item 5c.

e. Total cost of the pump and installation was $715. Green River Valley has no specific information regarding the size or useful life of the installed pump. It deferred to the licensed plumber's judgment and experience regarding the size and type of pump to install. Any information regarding the pump's specifications and warranty was likely provided to the customer who received the pump. Based upon a brief review of available pumps, Green River Valley Water District estimates that the useful life of the pump was between five and ten years.

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 6

Responding Witness: David Paige

Q-6. Explain how the installation of individual pumps at the customer's expense complies with the requirements of 401 KAR Chapter 8, 807 KAR 5:066 Section 5(1) and the "General Design Criteria for Surface and Ground Water Supplies" as they pertain to water distribution systems and are incorporated by reference in the Kentucky Division of Water regulations.

A-6. Green River Valley Water District has moved to withdraw its proposed tariff revision and no longer takes the position that an existing customer or an applicant for service may be required to install and maintain at its own expense pumping equipment to receive water service at the pressure requirements set forth in the regulations of the Division of Water or the Public Service Commission. If a utility is unable to provide water service to an applicant at the required pressures with the installation of an individual pump, however, the extension of the water service to that applicant may be unreasonable.

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 7

Responding Witnesses: David Page/Vaughn Williams

Q-7. Refer to Green River Valley District's Response to Commission Staff's Second Request for Information (Response to Staff's Second Request), Item 4.

a. Provide the status of the booster pump station construction project.

b. Provide the estimated cost of the booster pump station construction project.

c. Provide the funding source for the booster pump station construction project.

d. Explain whether the booster pump station construction project will require Green River Valley District to obtain a Certificate of Public Convenience and Necessity.

e. Provide an engineering report, hydrolytic analysis, or study showing how the proposed booster pump station project will impact the water pressure in Green Valley River District's distribution system.

f. Provide the estimated beginning and completion date for Green River Valley District's proposed booster pump station construction project.

g. Provide a list of Green River Valley District's customers experiencing pressure below the required 30 psi that the booster pump station is expected to provide with the required 30 psi when completed.

A-7. a. On July 16, 2020, Green River Valley Water District's Board of Commissioners authorized the construction of a booster pump station and agreed to retain Kenvirons, Inc., an engineering firm, to prepare the plans and specifications for the booster pumping station. Plans and specifications will be submitted to the Division of Water no later than September 15, 2020. Green River Valley Water District will publish a request for bids on the proposed project on or about October 15, 2020. Construction is expected to begin in November 2020.

b. The estimated total cost, including construction and engineering costs, is $110,000.

c. The project will be funded through reserve funds. No debt will be issued.

d. As total cost of this water improvement project is less than $500,000, the project is exempted from the requirement for a certificate of public convenience and necessity. KRS 278.020(1)(a)3. Assuming that the project was not exempted under

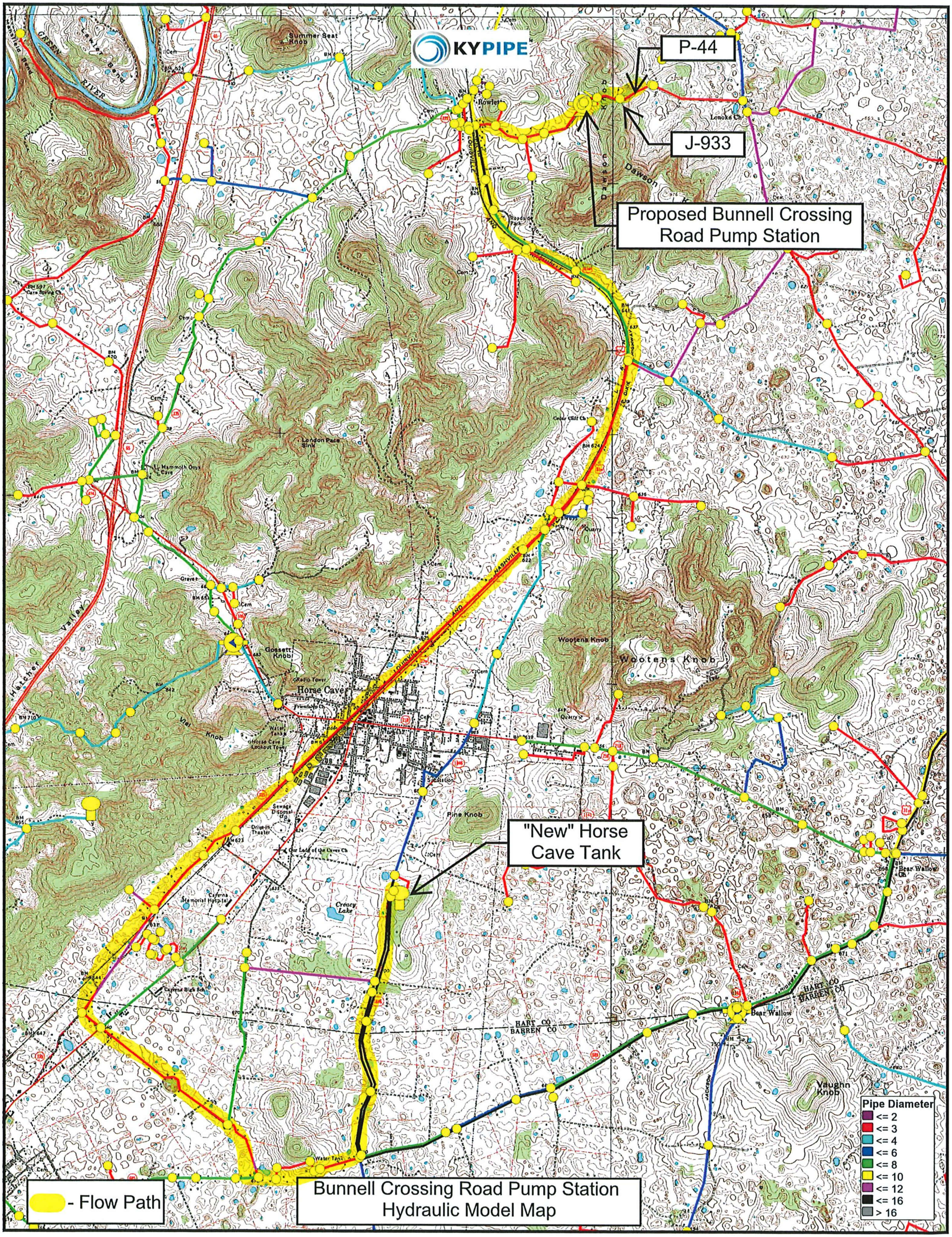
KRS 278.020(1)(a), it is an ordinary extension in the usual course of business. The project does not duplicate existing facilities, will not compete with the facilities of other utilities, or conflict with the existing certificates of other water utilities. The expected cost of the project represents less than 0.5 percent of Green River Valley Water District's net utility plant and is not a sufficient capital outlay to materially affect the water district's existing financial condition or cause an increase in charges to its customers.

e. A hydraulic analysis has not yet been completed. Such analysis must be prepared and submitted to the Division of Water with the project's plans and specifications. Green River Valley Water District will file with the Commission the analysis and plans and specification upon their completion. Green River Valley Water District expects that, upon completion of the booster pump station, water pressure to customers located along Bunnell Crossing will range between 45 psig and 50 psig. For a map of the proposed location for the booster station pump, see Attachment 7.

f. Construction is expected to begin in November 2020 and to be completed in May 2021. The COVID-19 pandemic has disrupted some supply chains and created delays in the delivery of order equipment. The delivery of the pump may take as long as 20 weeks after the order has been issued.

g. Upon completion of the proposed project, **all customers along Bunnell Crossing Road** will receive water service at a pressure between 45 psig and 50 psig.

ATTACHMENT 7



Bunnell Crossing Road Pump Station
Hydraulic Model Map

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 8

Responding Witness: Legal Counsel

Q-8. Refer to Response to Staff's Second Request, Item 5c, proposed tariff sheet, Section AG.2. Existing Customers.

a. Provide the legal basis for Green River Valley District's responsibility for maintenance and repair of an individual pump for one year following the installation of the pump on the customer's side of the meter.

b. Provide the legal basis for Green River Valley District's customers' responsibility for maintenance and repair of an individual pump for one year following installation on Green River Valley District's side of the meter.

A-8. a. Green River Valley Water District has moved to withdraw the proposed tariff sheet. It has adopted a policy that requires the installation, maintenance and replacement of individual pumps at a customer or applicant's property **at Green River Valley Water District's expense** if such pumps are necessary and feasible to ensure delivery of water service to the customer or applicant at the required minimum pressures. See Attachment 12 to Item 12 of this Response.

b. See response to 8a.

GREEN RIVER VALLEY WATER DISTRICT

Response to Commission Staff's Fifth Request for Information
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Question No. 9

Responding Witness: Legal Counsel

Q-9. Refer to Green River Valley District's Response to Commission Staff's Third Request for Information, Item 3. Explain whether the reasonable conditions that every utility may place upon the provision of service as articulated in KRS 278.030 apply to customers who are applying for new service as well as existing customers of the utility.

A-9. Green River Valley Water District interprets the request as inquiring whether a utility may impose upon applicants for service conditions for service that differ from those imposed upon existing customers.

Where a utility proposes to treat existing customers and applicants in a different manner, both KRS 278.030 and KRS 278.170 must be considered. KRS 278.030 permits a utility to impose reasonable conditions for service. The conditions imposed upon existing customers and applicants for service, therefore, must be reasonable. It does not require that the conditions be identical. KRS 278.170(1), however, requires that a reasonable basis for the difference in treatment must exist. It provides:

> No utility shall, as to rates or service, give any unreasonable preference or advantage to any person or subject any person to any unreasonable prejudice or disadvantage, or establish or maintain any unreasonable difference between localities or between classes of service for doing a like and contemporaneous service under the same or substantially the same conditions.

In *Public Service Commission of Kentucky v. Commonwealth*, 320 S.W.3d 660, 667 (Ky. 2010), the Kentucky Supreme Court explained the interplay between the two statutes and how they permit utilities to impose different conditions of service upon customers:

> KRS 278.170(1) prohibits any "unreasonable preference or advantage", any "unreasonable prejudice or disadvantage" or any "unreasonable difference" for "doing a like and contemporaneous service under the same or substantially the same conditions." The qualifier "unreasonable" clearly points to the conclusion that reasonable distinctions between recipients of utility services, "classes of service" or utility rates are legally appropriate. *See also National-Southwire Aluminum Co.*, 785 S.W.2d at 514 ("Even if some discrimination actually exists, Kentucky law does not prohibit it per se. According to KRS 278.170(1), we only prohibit 'unreasonable prejudice or disadvantage' or an 'unreasonable difference.'"). This logical interpretation is reinforced by KRS 278.030(3), quoted *supra*, which allows

> a utility to employ "suitable and reasonable classifications of its service, patrons and rates." Both statutes expressly recognize the propriety of a utility drawing distinctions in its rates and making classifications among its customers subject always to the touchstone of reasonableness. The overseer of each utility's compliance with the statutory mandate is the PSC subject, of course, to appropriate judicial review.

The Commission has recognized this principle by permitting utilities to treat applicants for service differently from existing customers. For example, the Commissioner has permitted utilities to continue to make available to existing customers certain services while denying those services to new applicants. *See, e.g., Tariff Filing of Christian County Water District Proposing Various* Revisions, Case No. 2006-00032 (Ky. PSC Nov. 2, 2006) (prohibiting new connections in which multiple structures connect to water system through a single meter but permitting existing connections with multiple structures connecting through a single meter to continue); *The Tariff Filing of South Central Bell Telephone Company to Grandfather Information Delivery Service (976 Service)*, Case No. 92-291 (Ky. PSC Dec. 10, 1992) (allowing telephone utility to cease providing certain information services to new customers but permitting service to continue to existing customers); *Application of the Union Light, Heat and Power Company to Establish A Sodium Vapor Outdoor Lighting Tariff and to Grandfather the Existing Private Outdoor Lighting, Flood Lighting and Underground Street Lighting Tariffs*, Case No. 8545 (Ky. PSC Sept. 2, 1982) (allowing electric utility to cease providing certain lightning services to new customers, but permitting service to continue to existing customers). Similarly, it has allowed utilities to impose conditions of service on applicants for service, that it does not impose on existing customers. *See e.g.* Tariff of Kentucky Utilities Company, P.S.C. Ky. No. 19, Original Sheet No. 40 (permitting existing customers to receive pole attachment service under existing license agreements but requiring all new customer to take service under new tariff); Tariff of Inter-County Energy Cooperative, P.S.C. Ky. No. 8, First Revised Sheet No. 8 (permitting customers served under Schedule 1 prior to July 1, 2004 to continue to receive electric service under that schedule notwithstanding their failure to meet new availability provisions);.Tariff of Northern Kentucky Water District, P.S.C. Ky. No. 5, Original Sheet No. 7 (establishing different points of service for customers based upon date of meter installation). The Commission permits Green River Water District to prohibit new connections from serving more than one structure while permitting existing connections to serve multiple structures. *See* Tariff of Green River Valley Water District, P.S.C. Ky. No. 1, Original Sheet 13.

Simply put, a utility may impose conditions for service on applicants for service that differ from those imposed on existing customers. These conditions must be reasonable and a reasonable basis for different conditions must exist. The utility seeking to impose such conditions bears the burden of demonstrating the reasonableness of the conditions and the existence of a reasonable basis for the different treatment.

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 10

Responding Witness: David Paige

Q-10. State whether any requirements pertaining to Green River Valley District's ability to maintain consistent and adequate water pressure on its system have been placed upon Green River Valley District by The Kentucky Infrastructure Authority (KIA), the United States Department of Agriculture acting through Rural Development (USDA/RD), or the Kentucky Rural Water Finance Corporation (KRWFC) in conjunction with financing of any water improvement project.

A-10. Green River Valley Water District is not aware of any specific requirements related to water pressures imposed upon it by Rural Development, the Kentucky Infrastructure Authority, or the Kentucky Rural Water Finance Corporation.

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 11

Responding Witness: David Paige

Q-11. Provide copies of any assurances of the ability to maintain consistent and adequate water pressure made by Green River Valley District and provided to KIA, USDA/RD, KRWFC, or the Kentucky Division of Water.

A-11. Green River Valley Water District has not found any written assurances of its ability to maintain consistent and adequate water pressure provided to the Kentucky Infrastructure Authority, Rural Development, or to the Kentucky Rural Water Finance Corporation. When its consulting engineer submits plans for any water distribution system improvement to the Kentucky Division of Water for review and approval, the engineer certifies only that upon the construction of the facility or improvement for which approval is sought all the facilities will be operating in accordance with Division of Water requirements. The Division of Water must review and determine the accuracy of any certification prior to approving the plans and specifications. Division of Water Regulations currently require Green River Valley Water District to operate its distribution system in accordance with the *Recommended Standards for Water Works*, 12th Edition.

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 12

Responding Witness: David Paige

Q-12. State whether Green River Valley District has reviewed its entire system and analyzed where within the system low water pressure is an issue that Green River Valley District needs to address.

a. If there has been a study, analysis, or review of Green River Valley District's distribution system that has identified areas of the water system where low water pressure is an issue, provide a copy of the study, analysis, or review.

b. If no study, analysis, or review of the water system has been completed, explain why Green River Valley District's Board of Commissioners has not authorized this to be completed.

c. Provide all minutes of all Board Meetings at which any study, project analysis, or review of the water system has been discussed from 2015 to the present.

A-12. Green River Valley Water District has not conducted a formal review of its system to determine locations where low pressure is an issue.

a. Not applicable.

b. Green River Valley Water District's Board of Commissioners was not aware of a significant problem involving low pressure. The water district investigates low pressure complaints and, where low pressure problems are discovered, takes steps to correct the problem. On August 20, 2020, the Board of Commissioners adopted a low water pressure policy that ensures full awareness of any low water pressure problems. This policy requires the District's General Manager to report monthly to the District's Board of Commissioners on low pressure incidents within the District's distribution system involving existing customers or applicants for service in which water service cannot be provided at 30 psig or above without the installation of an individual pump. If two or more instances occur in the same vicinity, the District's General Manager is required to consult with the District's Consulting Engineer to determine if a systemic problem exists and the possible courses of action to correct the problem and then report his or her findings and recommendations to the Board for action. A copy of this policy is attached to this Response as Attachment 12.

c. A review of the minutes of the meetings of the Board of Commissioners since 2015 do not indicate any discussions regarding a study, project analysis or review of the water system.

ATTACHMENT 12

GREEN RIVER VALLEY WATER DISTRICT
POLICY ON WATER PRESSURE

1. Green River Valley Water District ("the District") is a public water utility. As a public water utility, KRS 278.030(2) requires it to furnish adequate, efficient and reasonable service. KRS 278.280(3) requires it to make reasonable extensions of service to applicants for service that meet the conditions for service set forth in the District's filed rate schedules.

2. As a public water utility, the District is also required to comply with the regulations of the Kentucky Public Service Commission ("PSC") and the Kentucky Division of Water ("DOW") regarding the operation of its water distribution system and the delivery of water service to the public. PSC regulations (807 KAR 5:066, Section 5(1)) provide that in no event shall the pressure at the customer's service pipe under normal conditions fall below thirty (30) pounds per square inch gauge ("psig") nor shall the static pressure exceed 150 psig. DOW regulations require the District's distribution facilities be designed in accordance with the *Recommended Standards for Water Works*, 2012 Edition, which requires that a minimum pressure of 20 psi at ground level at all points in the District's distribution system under all conditions of flow.

3. The District finds any applicant for water service that meets all conditions of service set forth in the District's filed rate schedules shall be permitted to connect to the District's water distribution system so long as the District is able to provide water service at a pressure of at least 30 psig at the point of connection of the customer's service line and the District's facilities ("the customer's meter").

4. If the District is unable to provide water service to an applicant for service at a pressure of at least 30 psig at the customer's meter but can do so if an individual pump is installed on the customer's side of the point of connection, the District shall **at its own expense** install such a pump and shall be responsible for the pump's maintenance and repair. If an installed pump fails and such failure is not the result of the customer's negligence or willful misconduct, the District shall **at its own expense** replace the failed pump and shall be responsible for the replacement pump's maintenance and repair.

5. If the District is unable to continue providing water service to an existing customer at a pressure of at least 30 psig at the meter but can do so if an individual pump is installed on the customer's side of the point of connection, it shall **at its own expense** install such a pump and shall be responsible for the pump's maintenance and repair. If an installed pump fails and such failure is not the result of the customer's negligence or willful misconduct, the District shall **at its own expense** replace the failed pump and shall be responsible for the replacement pump's maintenance and repair

6. If the District is unable to provide to an applicant for service water service at a pressure of at least 30 psig at the customer's meter with the installation of an individual pump, its General Manager and Consulting Engineer shall determine whether the requested extension of service to the applicant is reasonable and report their findings to the District's Board of Commissioners.

These findings shall include a description of the actions necessary to increase water pressure at the customer's meter and the cost to undertake those actions.

7. The District's General Manager shall report monthly to the District's Board of Commissioners on low pressure incidents within the District's distribution system involving existing customers or applicants for service in which water service cannot be provided at 30 psig or above without the installation of an individual pump. If two or more instances occur in the same vicinity, the District's General Manager shall consult with the District's Consulting Engineer to determine if a systemic problem exists and the possible courses of action to correct the problem and then report his or her findings and recommendations to the Board for action.

8. This policy shall not be interpreted or construed as requiring the District to make unreasonable extensions of service.

Approved: August 20, 2020

GREEN RIVER VALLEY WATER DISTRICT

Response to Commission Staff's Fifth Request for Information
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Question No. 13

Responding Witness: David Paige

Q-13. Provide a list of all projects that Green River Valley District has completed to address low pressure for the water system from 2015 to the present.

A-13. No project constructed since January 1, 2015 has been for the purpose of addressing low water pressure.

GREEN RIVER VALLEY WATER DISTRICT

Response to Commission Staff's Fifth Request for Information
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Question No. 14

Responding Witness: David Paige

Q-14. Refer to Staff's First Request, Item 4. For all customer locations shown on the map, provide the size of the main serving these customers, the type of material the mains are made of, and the number of line breaks that have occurred on these mains since 2015.

A-14. See Green River Valley Water District's Response to Commission Staff's First Request for Information, Item 4, Attachment 4. Attachment 4 indicates the location of the customers and shows the size of all lines serving these customers. The customers located on Bunnell Road are directly served through a 3-inch polyvinyl chloride (PVC) water main that was constructed in 1970. The customer located on Bolton School Road is served through 3-inch PVC water main constructed in 2010. The customer located on Baumgardner Road is served through a 6-inch PVC water main.

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 15

Responding Witness: David Paige

Q-15. State Green River Valley District's policy on installing and maintaining pressure regulators at customer services. State whether this policy is written and how it is conveyed to customers.

A-15. Public Service Commission regulations prohibit water pressures at the delivery point from exceeding 150 pounds per square inch. Green River Water District has always acknowledged its responsibility to install and maintain pressure regulators to ensure compliance with these regulations.

Green River Valley Water District does not have a written policy on installing and maintaining pressure regulators at customer services. It will confirm this policy orally to customers when questioned about it.

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 16

Request did not contain a Question No. 16

GREEN RIVER VALLEY WATER DISTRICT

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

Question No. 17

Responding Witnesses: David Paige/Vaughn Williams

Q-17. Refer to Response to Staff's First Request, Item 6.

a. Provide the normal discharge pressure while pumping for the "North Zones," and "South Zones" high service pumps and the Munfordville Pump Station.

b. Provide the typical range of operating levels for the New Horse Cave Tank, the Bonnieville Tank, and the Magnolia Tank.

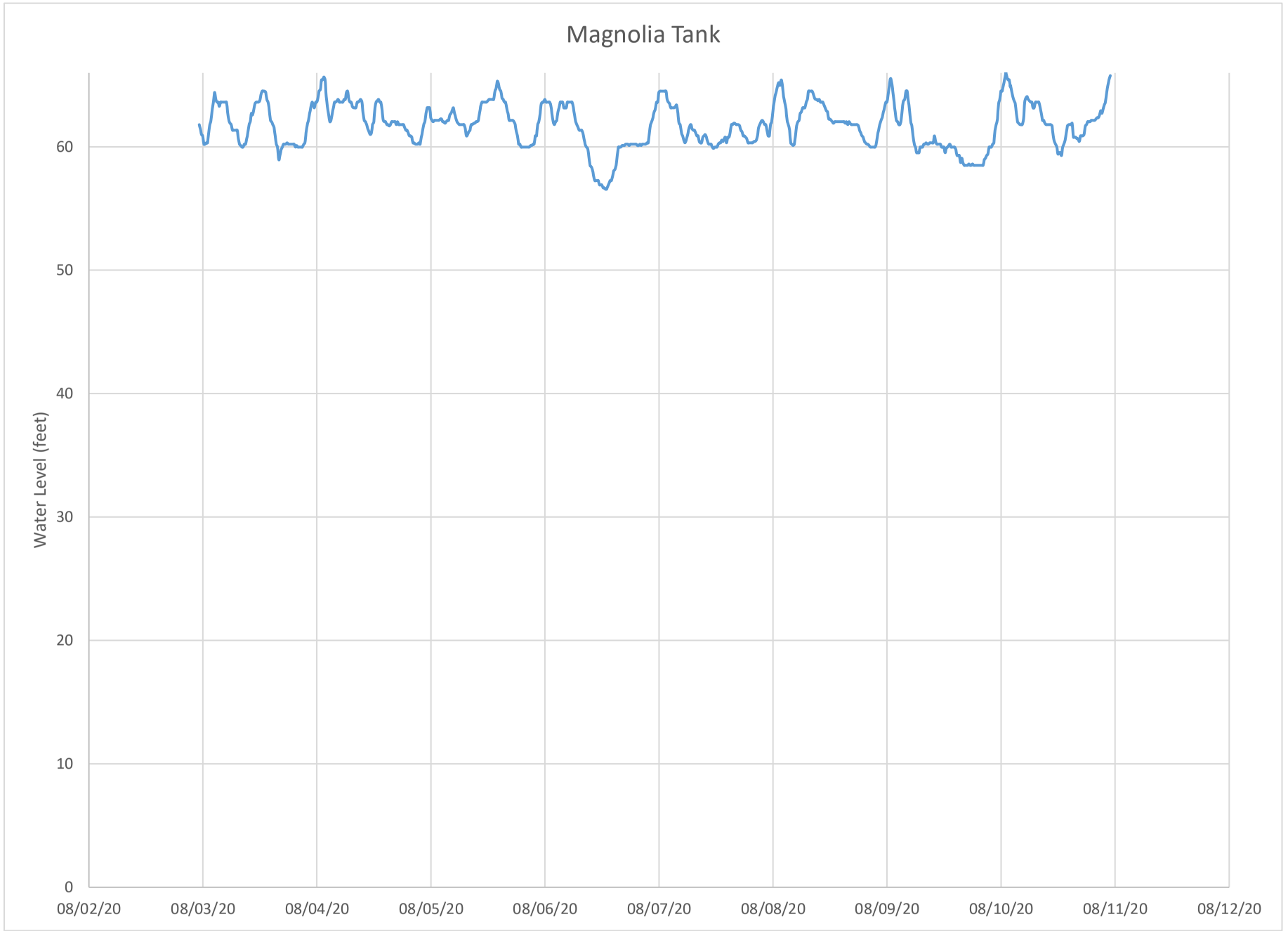
c. Provide a graph or chart from SCADA showing tank levels for a one-week span for the New Horse Cave Tank, the Bonnieville Tank, and the Magnolia Tank.

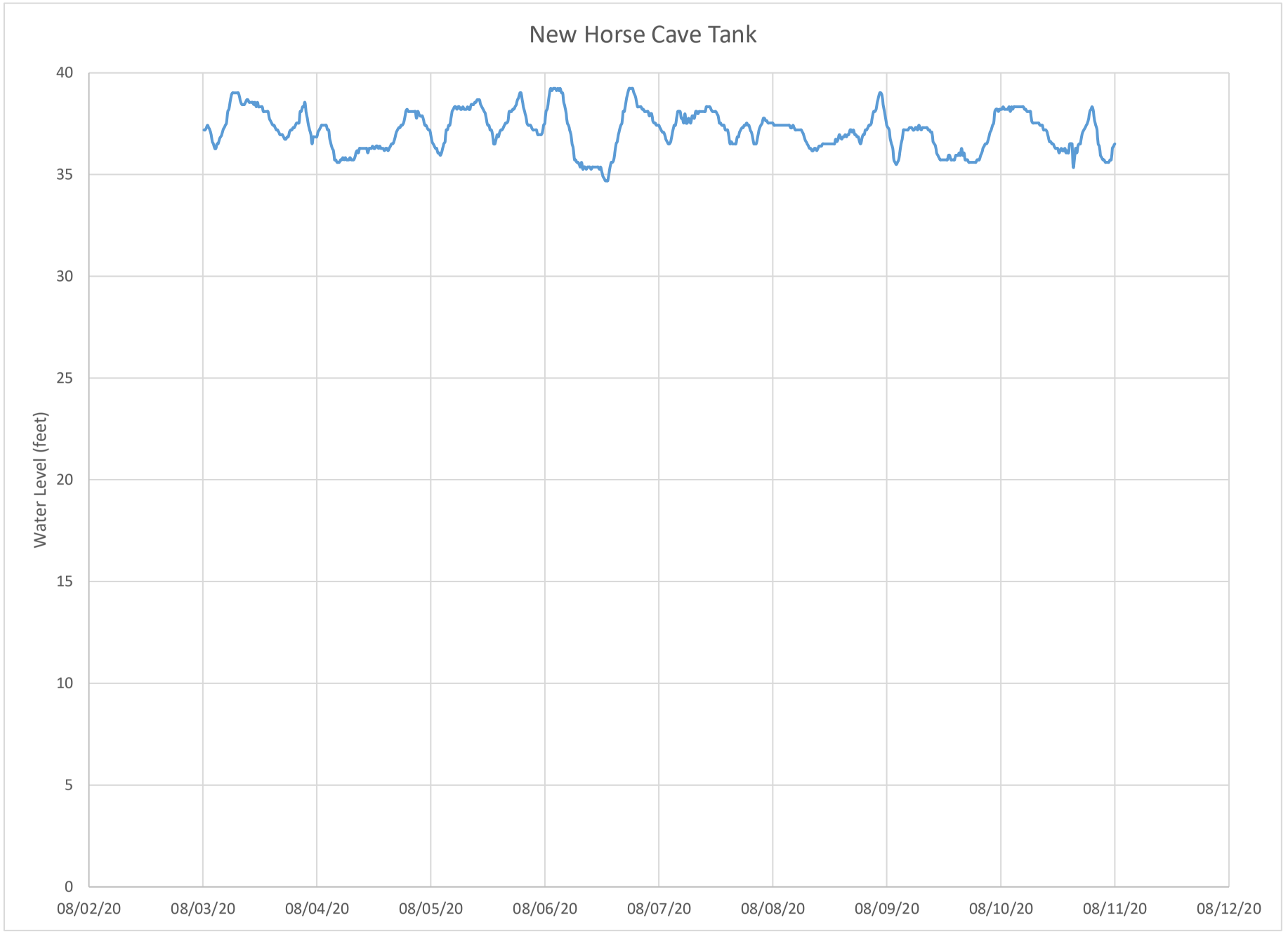
A-17. a. North Zone High Service Discharge – 214 psig
South Zone High Service Discharge – 165 psig
Munfordville Pump Station Discharge – 134 psig

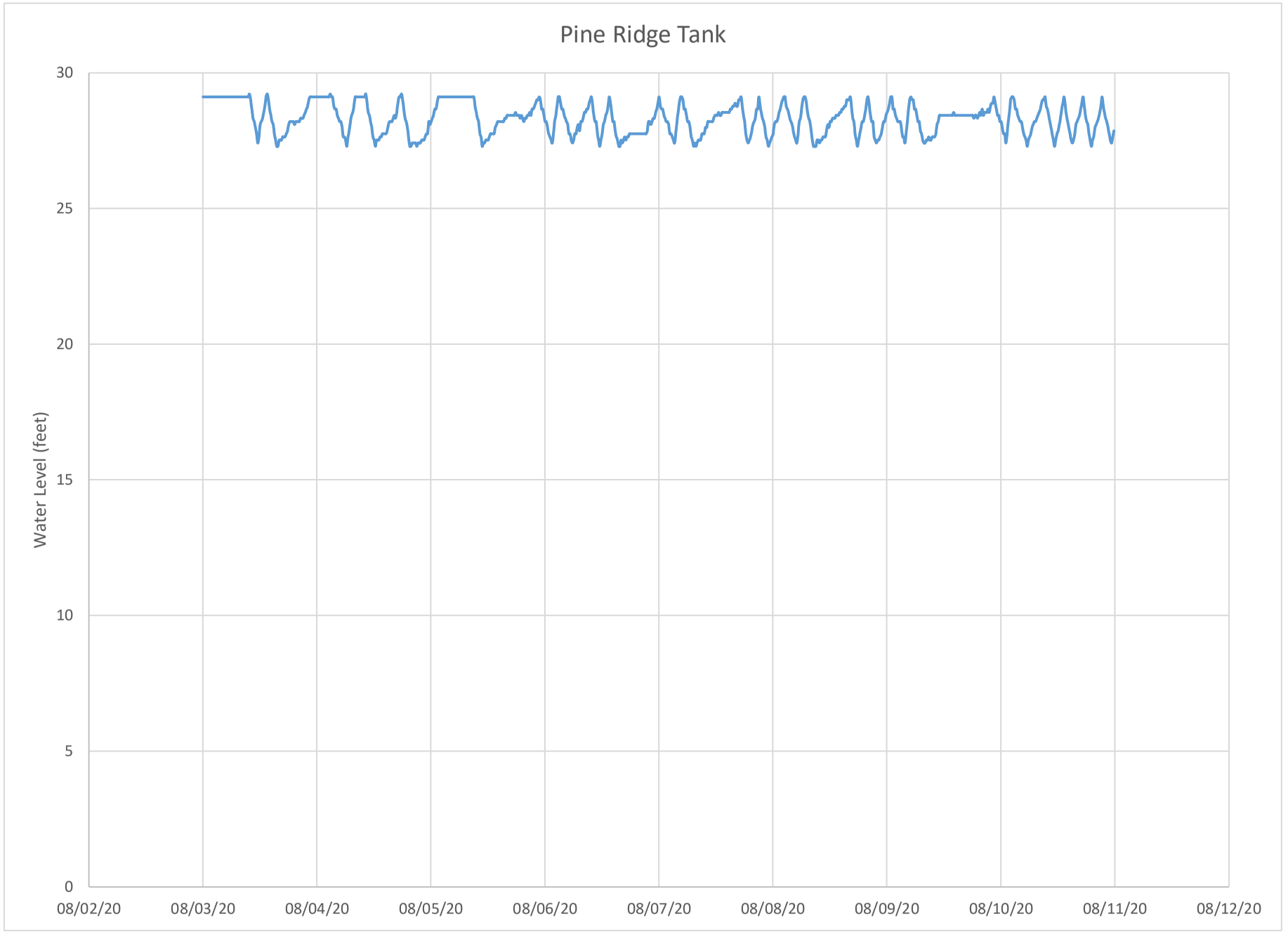
b. New Horse Cave Tank – 36 to 39 feet
Bonnieville Tank – 27 to 29 feet
Magnolia Tank – 56 to 65 feet

c. See Attachment 17. Bonnieville Tank is gravity fed from the Pine Ridge Tank and is therefore not monitored. Attachment 17 includes a pressure chart for the Pine Ridge Tank.

ATTACHMENT 17


Magnolia Tank
Water Level (feet)
0
10
20
30
40
50
60
08/02/20
08/03/20
08/04/20
08/05/20
08/06/20
08/07/20
08/08/20
08/09/20
08/10/20
08/11/20
08/12/20


New Horse Cave Tank
Water Level (feet)
40
35
30
25
20
15
10
5
0
08/02/20
08/03/20
08/04/20
08/05/20
08/06/20
08/07/20
08/08/20
08/09/20
08/10/20
08/11/20
08/12/20


Pine Ridge Tank
Water Level (feet)
30
25
20
15
10
5
0
08/02/20
08/03/20
08/04/20
08/05/20
08/06/20
08/07/20
08/08/20
08/09/20
08/10/20
08/11/20
08/12/20