

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

In the Matter of:

**ELECTRONIC APPLICATION OF WESTERN )  
PULASKI COUNTY WATER DISTRICT FOR THE )  
ISSUANCE OF A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY TO )  
CONSTRUCT A WATER IMPROVEMENTS ) Case No. 2020 - 00119  
PROJECT PURSUANT TO THE PROVISIONS )  
OF KRS 278.020 AND 807 KAR 5:001 )**

**Response to Commission Staff's Second Request for Information**

Western Pulaski County Water District ("Western Pulaski District"), by Counsel, hereby files its Response to the Commission Staff's Second Request for Information, dated May 13, 2020, as follows:

**REQUEST 1:** Explain why the Application, Exhibit F, states that the replacement of existing and dilapidated and undersized water lines, installation of 100 radio-read meters, and replacement of service lines has been eliminated from Phase II, and Western Pulaski District's response to Commission Staff's Initial Request for Information (Response to Staff's Initial Request), Item 4.c. states these items have not been eliminated.

**WITNESS:** Don Calder, Chairman, Western Pulaski County Water District.

**RESPONSE 1:** At the time of bidding it was anticipated that there would not be enough available funds to complete a portion or all of these replacements. Therefore, these items were not included in the bidding process and eliminated. In addition, one of the items, the 100 radio read meters, had already been purchased and installed by the Western Pulaski District. It is the intention of the Western Pulaski District to use any remaining funds, and as far as funds will allow, on the construction of the water line and service replacements at the end of Phase II construction.

**REQUEST 2.** Refer to response to Staff's Initial Request, Item 4.c.

**(a)** Provide the total cost and the source of funds for the water line replacement project that is currently underway in the Slate Branch Road/Oak Hill Road area.

**WITNESS:** Don Calder, Chairman, Western Pulaski County Water District.

**RESPONSE 2(a):** The total cost of the Slate Branch/Oak Hill Road area is \$94,992.00. The source of funds is from the \$3,304,000 KIA/DWSRF loan F16-003. The Plans for the Slate Branch Road/Oak Hill Road Contract 2A and the Final Budget are being filed simultaneously with this Response.

**(b)** If the funding source for the project is proceeds from the \$3,304,000 loan approved by the Commission in Case No. 2017-00063, state why Western Pulaski District did not seek Commission approval to utilize those funds as directed by the final Order in Case No. 2017-00063.

**RESPONSE 2(b):** The funding source is proceeds from the \$3,304,000 KIA/DWSRF loan approved by the Commission in Case No. 2017-00063. Western Pulaski District has not expended any KIA/DWSRF funds on this portion of the project as of this date and is waiting for Commission approval in this case.

**REQUEST 2(c):** Provide the projected cost and the source of funds for the planned water line replacement project in the Kentucky 80/Fishing Creek Bridge area.

**WITNESS:** Don Calder, Chairman, Western Pulaski County Water District.

**RESPONSE 2(c):** The total cost of the Kentucky 80/Fishing Creek Bridge area water line replacement project is approximately \$1,865,000. The source of funds is from a USDA, Rural Development grant of approximately \$719,000 and the remaining source is being applied for through a KIA Fund B loan of \$1,146,000.

**REQUEST 2(d):** If the funding source for the planned project is proceeds from the \$3,304,000 loan approved by the Commission Case No. 2017-00063, state why Western Pulaski District has not sought Commission approval to utilize those funds as directed by the final Order in Case No. 2017-00063.

**RESPONSE 2(d):** The funding sources are not proceeds from the \$3,304,000 loan approved by the Commission in Case No. 2017-00063.

**REQUEST 2(e):** Provide the total cost and the source of funds for the 100 radio-read meters that have been added to Western Pulaski District's system. State when the radio-read meters were added to the system.

**RESPONSE 2(e):** The total cost of the 100 radio-read meters was approximately \$45,000. The source of funds is the Western Pulaski District. The meters were installed between January 6, 2020 and March 13, 2020.

**REQUEST 2(f):** If the funding source for the radio-read meters was proceeds from the

\$3,304,000 loan approved by the Commission Case No. 2017-00063, state why Western Pulaski District did not seek Commission approval to utilize those funds as directed by the final Order in Case No. 2017-00063.


**RESPONSE 2(f):** The funding source is not proceeds from the \$3,304,000 loan approved by the Commission Case No. 2017-00063.

**REQUEST 2(g).** Provide the projected costs of the Clifty Road and the WTLO Road line replacement projects.

**RESPONSE 2(g):** Project costs for the Clifty Road project is estimated to be \$59,595.00. Project costs for the WTLO Road is estimated to be \$307,091.00

**Certification of Responses to Commission Staff's Second Request for Information**


I hereby certify that I have provided the responses to the Commission Staff's Second Request for Information. This information provided is the Responses is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
Don Calder, Chairman  
Western Pulaski County Water District

The undersigned has prepared this Response as Counsel to and on behalf of the Western Pulaski County Water District, a governmental agency, and hereby certifies that this Response is true and accurate to the best of the undersign's knowledge, information and belief formed after a reasonable inquiry.


Respectfully Submitted:

Rubin & Hays

By   
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#### CERTIFICATE OF SERVICE

The undersigned, in accordance with 807 KAR 5:001, Section 8, hereby certifies that Western Pulaski County Water District's electronic filing of the foregoing Response is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Kentucky Public Service Commission on May 19, 2020; that there are currently no parties that the Kentucky Public Service Commission has excused from participation by electronic means in this proceeding; and that this Response in paper medium will be delivered to the offices of the Kentucky Public Service Commission in Frankfort, Kentucky in accordance with the mandates set forth in the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085 within 30 days of the lifting of the current state of emergency.

  
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District