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

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In the Matter of

*Electronic* Application of Bluegrass Water Utility Operating Company, LLC for an Adjustment of Rates and Approval of Construction

Case No. 2020-00290

## Supplement to Responses to Post-Hearing Data Requests

Applicant, Bluegrass Water Utility Operating Company, LLC, herewith supplements its Response to the Commission Staff's Post-Hearing Request for Information and its Response to Joint Intervenors' Post-Hearing Data Requests, which were filed in this case on May 31, 2021, with additional responsive material to PSC ph DR 01(c) and INT ph DR 13 and with the response to PSC ph DR 07 (which was omitted from the 5/31/21 Response to the Commission Staff's Post-Hearing Request for Information). The verifications contained in the 5/31/21 Responses also apply respectively to the responses filed herewith.

Respectfully submitted,

<u>/s/Katherine K. Yunker</u> Katherine K. Yunker Kathryn A. Eckert McBRAYER PLLC 201 East Main St., Suite 900 Lexington, KY 40507 (859) 231-8780 kyunker@mcbrayerfirm.com keckert@mcbrayerfirm.com

Counsel for Applicant, Bluegrass Water Utility Operating Company, LLC

#### Request

- Refer to Bluegrass Water's responses to Commission Staff's Second Request for Information, Item 12. The original request asked Bluegrass Water to provide a spreadsheet, in Excel format with all formulas unprotected and all rows and columns fully accessible, with the information contained in attachment BGUOC2020RateCaseRateBase\_(Sewer).xlsx broken down by each sewer system. In its response Bluegrass -3- Case No. 2020-00290 Water provided a separate rate base spreadsheet for each sewer system but the total of all 19 Excel spreadsheets did not equal the amounts listed in BGUOC2020RateCaseRateBase\_(Sewer).xlsx.
  - a. Provide a single spreadsheet, in Excel format with all formulas, columns, and rows unprotected and fully accessible, listing the 13-month average rate base for each separate sewer system that totals to the 13-month average rate base contained in *BGUOC2020RateCase-RateBase\_(Sewer).xlsx*; Tab: FY Rate Base Sewer B1.
  - b. Provide a single spreadsheet, in Excel format with all formulas, columns, and rows unprotected and fully accessible, listing the 13-month average rate base for each separate sewer system that totals to the 13-month average rate base contained in Excel Spreadsheet *BYupdate-RateBase(Sewer).xlsx*; Tab: FY Rate Base Sewer B1.
  - c. Provide an explanation of why the amounts did not match in the documents originally provided.

#### Response

- a. Due to the process used to update rate base numbers at the end of the base period, the data source necessary to produce system level rate base specific numbers is no longer available.
- b. For the requested information, please see the separately provided Excel workbook with filename *PSCphDR01b xlsx*.
- c. A data source was inadvertently omitted from the Utility Plant in Service totals for the system. This data source was CWIP balances that were on the books of Bluegrass Water as of 12/31/2020 but the assets were not yet placed into service.

SUPPLEMENT: Additionally, an incomplete formula omitted several cells from the subtotal lines on the rate base worksheets.

#### Request

7. State whether the Commission has granted other sewer utilities deviations from 807 KAR 5:071 Section 7(4), when requested.

#### Response

The Commission has granted sewer utilities deviations from the 807 KAR 5:071 § 7(4) requirement to "make inspections of all mechanical equipment on a daily basis." For example:

- <u>Case No. 2014-00277</u>, Order entered December 16, 2014: The Commission found that Springcrest Sewer was not in compliance with the daily inspection requirement and granted a *temporary* deviation, until no later than December 15, 2015, to allow the utility to make *weekly* inspections of the system's mechanical equipment while it took actions to bring its inspection schedule into compliance with the regulation.
- <u>Case No. 2017-00246</u>, Order entered February 1, 2018: The Commission granted in part a request by the McCreary County Water District ("MCWD") for deviation from the daily requirement as to the over 1200 active grinder pump stations on its sewer system, allowing simplex and duplex grinder pump stations to be inspected *annually*. MCWD expressly stated that it inspected main lift stations and the sewage treatment facility on a daily basis and did not request a deviation to conduct less frequent inspections as to that equipment. 6/30/17 Application ¶ 13, 22.
- <u>Case No. 2019-00069</u>, *sua sponte* Order entered May 7, 2019: On its own motion, the Commission ordered that all sewer utilities were granted deviation from the daily inspection requirement for grinder pump stations located on or near a customer's

property; that equipment is now to be inspected at least once every *five years*. In footnote 1 (p.1), the Commission gathered cases in which individual utilities had requested deviation from the daily-inspection requirement with respect to grinder pump stations. The 5/7/19 Order superseded any inspection period that had been ordered in response to a deviation request.

#### Request

13. Please provide an itemization of all work provided by Elasticity, LLC directly to Bluegrass Water during the base period and, if the work resulted in the creation or production of a tangible product (i.e. brochure, letter, etc.) or digital asset (i.e. a Facebook post), please provide a copy of same.

#### Response

The following table itemizes all work provided by Elasticity, LLC directly to Bluegrass

Content Type	January 2020	February 2020	March 2020	April 2020	May 2020	June 2020
Printed Materials			Updated Brochure			Letterhead
Misc. Work Product	1 Updated Website Copy	1 Brochure Copy				
Customer Emails	0	0	1	3	2	1
Facebook Posts	9	4	7	12	13	16
Twitter Posts	8	5	10	13	15	14
Videos						
Public Relations						
Website	2.5	3.5	2	2	4.5	4

Water during the base period (CY 2020):

Content Type	July 2020	August 2020	September 2020	October 2020	November 2020	December 2020
Printed Materials	Contractor Cards				Customer Envelopes	
Misc. Work Product	1 Video Shot List		1 Video Shot Spreadsheet	1 RFP	1 RFQ	1 Talking Points Set
Customer Emails	1	1	1	1	1	1
Facebook Posts	11	9	7	4	7	8
Twitter Posts	12	12	8	16	7	10
Videos	Raw video shoot		1 "Before" Video Reel			
Public Relations				2 Responses to Reporter	1 Media Training Feedback	
Website	1	1	0.5	0.5	0	0

Tangible products as a result of this work by Elasticity, LLC are provided separately as follows:

- Four (4) PDF files compiling the products by each calendar quarter with a filename beginning *INTph13attachment-Elasticity* and then indicating which quarter;
- An Excel workbook with filename *bluegrass video\_edits\_0928.xlsx*; and
- A video file, *Bluegrass Water UOC\_Before Reel.mp4*, of a size and format that cannot be filed electronically in the case; a copy of the file has been filed with the Commission and served on counsel for the other parties following the protocols for non-electronic filing cases or for materials that cannot be electronically file.

SUPPLEMENT: Bluegrass attaches hereto a series of stills taken from the video file, *Bluegrass Water UOC\_Before Reel.mp4*, showing the condition of the systems that it acquired before June 30, 2020. The following is an index with the PDF page number of each still, the time counter on the video file, and a description of what is depicted by title or facility and status:

PDF	Time	Title	Facility	Status		
Page	Stamp					
1	00:05	CSWR				
2	00:08	Bluegr	ass Water <u>Before</u> CSWR Interve	ntion		
3	00:14	Airvie	Airview Wastewater			
4	00:17		Clarifier Structure	Rusting structure, insecure structure		
5	00:29		Aeration Chamber	Plant and rust growth		
6	00:37		Aeration Tank and Bar Screen	Clogged and deteriorated bar screen		
7	00:45		Aeration Tank	Trees growing from treatment facility		
0	00.54	-		,		
8	00:54	1	Lagoon	Overgrown lagoon		
9	01:02		Clarifier and Catwalks	Rusted steel, debris, improper		
				piping		

PDF	Time	Title	Facility	Status	
Page	Stamp				
10	01:13	Brocklyn Wastewater			
11	01:19		Aeration Tanks	Deteriorating steel, nonfunctional flow meter	
12	01:28		Lagoon	Deteriorating berm and erosion	
13	01:34		Contact Chamber	Deteriorated structure and improper piping	
14	01:43		Lagoon Berm	Structure deteriorating and leaking	
15	01:51		Aeration Tanks	Rusted steel improper piping	
16	02:00		Contact Chamber and Lagoon	Deteriorating structure, overgrown lagoon, erosion	
17	02:09	Golde	n Acres Wastewater		
18	02:15		Plant	Stained riprap showing regular flooding	
19	02:24		Outfall	Pollution, effluent pipe clogged with debris	
20	02:35		Aeration Basin	Rusting structure, vegetation growth in plant	
21	02:44		Control Panel	Improper wiring	
22	02:53	Great	Oaks Wastewater		
23	03:00		Influent Lines	Improper influent lines, rusted structure	
24	03:05		Aeration Tank	Rusting structure, vegetation growth	
25	03:14		Aeration Tank	Vegetation growth in plant	
26	03:23		Aeration Tank	Rusting structure with vegetation overgrowth	
27	03:33		Outfall	Pollution	
28	03:42	LH Wa	stewater		
29	03:46		Bar Screen	Severe corrosion, damaged screen	
30	03:55		Blower	Excessive building on blowers	
31	04:04		Clarifier	Weir trough off level and submerged (nonfunctional)	
32	04:13		Chemical Building	Degraded structure, improper repairs	
33	04:19		Aeration Basin	Improper protection, piping and rust	
34	04:28	Persin	nmon Ridge Wastewater		
35	04:35		Lagoon	Damaged aerators, duckweed overgrowth	
36	04:50		Lagoon Cell	Duckweed overgrowth	
37	05:00		Contact Chamber	Improper wiring, rust	
38	05:08	Cente	Ridge Water District 1		
39	05:11		Well House Interior	No separation of chlorine and storage, exposed wiring and rafters	

PDF	Time	Title	Facility	Status	
Page	Stamp				
40	05:20		Chlorine Equipment	Obsolete and improperly installed	
				dosing pump	
41	05:29	Center Ridge Water District 2			
42	05:33		Out of Service Well House	Ice damaged well, piping, and	
				storage out of service	
43	05:42		Out of Service Well House	Exposed wiring on well head	
44	05:51		Hydropneumatic Tank	Tank has pinhole leaks at active well	
				site	
45	06:00		Active Well	Exposed wiring on well head	
46	06:08		Active Well House	Exposed wiring, damaged insultation	
47	06:17		Active Well House	Insulation damaged, chlorine in	
				same room as storage	
48	06:25		Active Well House	Obsolete and improperly installed	
				dosing pump, exposed wiring	
49	06:34	Cente	r Ridge Water District 3		
50	06:39		Well House	Damaged structure, improper	
		_		repairs	
51	06:48	_	Well 1	Damaged structure, exposed wiring	
52	06:56	_	Well 2	Damaged structure, exposed wiring	
53	07:05		Well 1	Power supply conduit exposed and	
		_		damaged	
54	07:13		Well House Interior	Exposed wiring, improper insulation,	
	07.00	-		chlorine and storage in same room	
55	07:22		Well House	Obsolete and improperly installed	
50	07.00	0		dosing pump	
56	07:30	Cente	r Ridge Water District 4	Democrad exterior	
57	07:35	-	Well House	Damaged exterior	
58	07:43	-	Well House	Exposed wiring	
59	07:54	Timeleo	Well House	Exposed wiring on well head	
60	08:00	IImbe	rland Wastewater	Exposed wiring improper piping	
61	08:05		initial Lift Station	Exposed wiring, improper piping, debris piles	
62	08:14	-	Influent Lift Station Panels	Exposed wiring	
63	08:14	-	Aeration Plant	Rusted steel, vegetation in plant,	
05	06.25			exposed wiring	
64	08:31	-	Aeration Tankage	Holes rusted through, leaking	
04	00.31			wastewater	
65	08:38	-	Aeration Tankage	Holes rusted through, leaking	
	00.50			wastewater	
66	08:48	1	Contact Chamber	Deteriorating structure, improper	
	00.40			post-aeration, improper chemical	
				storage	
				500,080	

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PDF	Time	Title	Facility	Status			
Page	Stamp						
67	09:00		Lagoon	Sludge filled, berm in poor condition			
68	09:05	River I	River Bluffs Wastewater				
69	09:09		Influent Line	Improper installation and materials			
70	09:19		Influent Lift Station	Improper influent lines, rusting steel			
71	09:27		Aeration Plant	Rusted steel throughout, damaged			
				equipment			
72	09:36		Aeration Plant	Steel lines repaired with duct tape			
73	09:44		Contact Chamber	Excessive corrosion, improper			
				chlorine dosing			
74	09:54	Fox Ru	in Wastewater				
75	10:00		Treatment Process Plant	Faulty electrical work & sloppy,			
				insulated piping			
76	10:06		Chemical and Material	Improperly stored chemicals and			
			Storage	materials, poor housekeeping,			
		_		rusted tankage			
77	10:15		Chemical and Material	Improperly stored chemicals and			
			Storage	materials, poor housekeeping,			
		_		rusted tankage			
78	10:21		Influent Lift Station	Improper electrical service,			
				improper equipment installation			
79	10:30	Kingsv	vood Wastewater				
80	10:35		Treatment Plant	Rusted structures, overgrowth			
		-		throughout the site			
81	10:43		Treatment Plant	Improperly stored chemicals,			
	10.50	-		vegetation growth in plant			
82	10:52		Facility Perimeter	Damaged fencing			
83	11:00	Lake Columbia Wastewater					
84	11:05	_	Fencing	Evidence of sewage overflow			
85	11:14	_	Bar Screen / Splitter Box	Severe corrosion, clogged piping			
86	11:25		Treatment Plant	Severe corrosion, poor chemical			
		4		storage, damaged piping			
87	11:33		Blower Housing & Treatment	Damaged housing, maintenance			
		4	Plant	failure			
88	11:45	4	Sludge Return Line	Improper installation and materials			
89	11:55		Sludge Return & Tank	Rusting steel, abandoned lines			
90	12:05	CSWR					



# BLUEGRASS WATER Utility Operating Company

A CSWR Managed Utility

Bluegrass Water Before CSWR Intervention

## **Airview Wastewater**

## **CLARIFIER STRUCTURE**

STATUS: RUSTING STRUCTURE, INSECURE STRUCTURE

## **AERATION CHAMBER**

STATUS: PLANT AND RUST GROWTH

## **AERATION TANK AND BAR SCREEN**

STATUS: CLOGGED AND DETERIORATED BAR SCREEN

NIBBBSS

STATUS: TREES GROWING FROM TREATMENT FACILITY

# LAGOON

#### STATUS: OVERGROWN LAGOON

## CLARIFIER AND CATWALKS

STATUS: RUSTED STEEL, DEBRIS, IMPROPER PIPING

STREET, STREET, STREET, ST

And Designation

## **Brocklyn Wastewater**

STATUS: DETERIORATING STEEL, NONFUNCTIONAL FLOW METER

# LAGOON

### STATUS: DETERIORATING BERM AND EROSION

## CONTACT CHAMBER

113

STATUS: DETERIORATED STRUCTURE AND IMPROPER PIPING



## STATUS: RUSTED STEEL, IMPROPER PIPING

## **AERATION TANKS**

1. 22-

## CONTACT CHAMBER AND LAGOON

STATUS: DETERIORATING STRUCTURE, OVERGROWN LAGOON, EROSION

## **Golden Acres Wastewater**

# PLANT STATUS: STAINED RIPRAP SHOWING REGULAR FLOODING

## STATUS: POLLUTION, EFFLUENT PIPE CLOGGED WITH DEBRIS

ALL STREET

# OUTFALL



## **AERATION BASIN**

## STATUS: RUSTING STRUCTURE, VEGETATION GROWTH IN PLANT

## **CONTROL PANEL**

....

STATUS: IMPROPER WIRING

## Great Oaks Wastewater

## STATUS: IMPROPER INFLUENT LINES, RUSTED STRUCTURE

**INFLUENT LINES** 

STATUS: RUSTING STRUCTURE, VEGETATION GROWTH

STATUS: VEGETATION GROWTH IN PLANT

STATUS: RUSTING STRUCTURE WITH VEGETATION OVERGROWTH

the share

# OUTFALL

a man

STATUS: POLLUTION
### LH Wastewater

# BAR SCREEN

STATUS: SEVERE CORROSION, DAMAGED SCREEN

# BLOWER

STATUS: EXCESSIVE BUILDUP ON BLOWERS

### CLARIFIER

STATUS: WEIR TROUGH OFF LEVEL AND SUBMERGED (NONFUNCTIONAL)

# CHEMICAL BUILDING

LUMBER

UNBER

LUMBER

STATUS: DEGRADED STRUCTURE, IMPROPER REPAIRS

### **AERATION BASIN**

TRUE T

STATUS: IMPROPER PROTECTION, PIPING AND RUST

### Persimmon Ridge Wastewater

# LAGOON

STATUS: DAMAGED AERATORS, DUCKWEED OVERGROWTH



STATUS: DUCKWEED OVERGROWTH

### CONTACT CHAMBER

**a** 10

STATUS: IMPROPER WIRING, RUST

### Center Ridge Water District 1



### WELL HOUSE INTERIOR

STATUS: NO SEPERATION OF CHLORINE AND STORAGE, EXPOSED WIRING AND RAFTERS

### STATUS: OBSOLETE AND IMPROPERLY INSTALLED DOSING PUMP

### CHLORINE EQUIPMENT



### Center Ridge Water District 2



### OUT OF SERVICE WELL HOUSE

STATUS: ICE DAMAGED WELL, PIPING, AND STORAGE OUT OF SERVICE

### OUT OF SERVICE WELL HOUSE

A CARLING AND A

STATUS: EXPOSED WIRING ON WELL HEAD

## HYROPNEUMATIC TANK

STATUS: TANK HAS PINHOLE LEAKS AT ACTIVE WELL SITE



### STATUS: EXPOSED WIRING ON WELL HEAD

## ACTIVE WELL

# ACTIVE WELL HOUSE

STATUS: EXPOSED WIRING, DAMAGED INSULATION



### ACTIVE WELL HOUSE

STATUS: INSULATION DAMAGED, CHLORINE IN SAME ROOM AS STORAGE

#### STATUS: OBSOLETE AND IMPROPERLY INSTALLED DOSING PUMP, EXPOSED WIRING

## ACTIVE WELL HOUSE



### **Center Ridge Water District 3**

STATUS: DAMAGED STRUCTURE, IMPROPER REPAIRS

### STATUS: DAMAGED STRUCTURE, EXPOSED WIRING





### STATUS: DAMAGED STRUCTURE, EXPOSED WIRING

### STATUS: POWER SUPPLY CONDUIT EXPOSED AND DAMAGED

a company of the second

WELL 1

# WELL HOUSE INTERIOR

STATUS: EXPOSED WIRING, IMPROPER INSULATION, CHLORINE AND STORAGE IN SAME ROOM

### STATUS: OBSOLETE AND IMPROPERLY INSTALLED DOSING PUMP

### WELL HOUSE



### Center Ridge Water District 4

STATUS: DAMAGED EXTERIOR

ω.

STATUS: EXPOSED WIRING

5.1.1

STATUS: EXPOSED WIRING ON WELL HEAD

and a many and

### **Timberland Wastewater**

### INFLUENT LIFT STATION

Carl Contractor Contractor Contractor

STATUS: EXPOSED WIRING, IMPROPER PIPING, DEBRIS PILES

### INFLUENT LIFT STATION PANELS

STATUS: EXPOSED WIRING

### **AERATION PLANT**

STATUS: RUSTED STEEL, VEGETATION IN PLANT, EXPOSED WIRING
### **AERATION TANKAGE**

STATUS: HOLES RUSTED THROUGH, LEAKING WASTEWATER

### **AERATION TANKAGE**

STATUS: HOLES RUSTED THROUGH, LEAKING WASTEWATER

# CONTACT CHAMBER

STATUS: DETERIORATING STRUCURE, IMPROPER POST-AERATION, IMPROPER CHEMICAL STORAGE

#### STATUS: SLUDGE FILLED, BERM IN POOR CONDITION

March 11 States and States and States

NA I DA

# LAGOON

#### **River Bluffs Wastewater**



#### STATUS: IMPROPER INSTALLATION AND MATERIALS

# INFLUENT LIFT STATION

STATUS: IMPROPER INFLUENT LINES, RUSTING STEEL

STATISTICS.

## **AERATION PLANT**

#### STATUS: RUSTED STEEL THROUGHOUT, DAMAGED EQUIPMENT

# AERATION PLANT

STATUS: STEEL LINES REPAIRED WITH DUCT TAPE

#### STATUS: EXCESSIVE CORROSION, IMPROPER CHLORINE DOSING

# CONTACT CHAMBER



#### Fox Run Wastewater

#### TREATMENT PROCESS PLANT

STATUS: FAULTY ELECTRICAL WORK & SLOPPY, INSULATED PIPING

网络小额小额子生

### CHEMICAL AND MATERIAL STORAGE

IMPROPERLY STORED CHEMICALS AND MATERIALS, POOR HOUSEKEEPING, RUSTED TANKAGE

## CHEMICAL AND MATERIAL STORAGE

IMPROPERLY STORED CHEMICALS AND MATERIALS, POOR HOUSEKEEPING, RUSTED TANKAGE

### INFLUENT LIFT STATION

STATUS: IMPROPER ELECTRICAL SERVICE, IMPROPER EQUIPMENT INSTALLATION

#### **Kingswood Wastewater**

### TREATMENT PLANT

STATUS: RUSTED STRUCTURES, OVERGROWTH THROUGHOUT THE SITE

# TREATMENT PLANT

STATUS: IMPROPERLY STORED CHEMICALS, VEGETATION GROWTH IN PLANT

an marked from

# FACILITY PERIMETER

STATUS: DAMAGED FENCING

#### Lake Columbia Wastewater



#### STATUS: SEVERE CORROSION, CLOGGED PIPING

#### BAR SCREEN/SPLITTER BOX

### **TREATMENT PLANT**

STATUS: SEVERE CORROSION, POOR CHEMICAL STORAGE, DAMAGED PIPING

#### **BLOWER HOUSING & TREATMENT PLANT**

STATUS: DAMAGED HOUSING, MAINTENANCE FAILURE

# SLUDGE RETURN LINE

STATUS: IMPROPER INSTALLATION AND MATERIALS

# **SLUDGE RETURN & TANK**

STATUS: RUSTING STEEL, ABANDONED LINES



#### CentralStatesWaterResources.com