COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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Electronic Application of Bluegrass)	
Water Utility Operating Company, LLC)	Case No. 2020-00290
for an Adjustment of Rates and Approval)	
of Construction)	

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,

/s/ Katherine K. Yunker

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Counsel for Applicant, Bluegrass Water Utility Operating Company, LLC

Request

- 1. 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.
- Case No. 2017-00246, 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 Water during the base period (CY 2020):

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

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	
8	00:54		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	
		4		in plant	
21	02:44		Control Panel	Improper wiring	
22	02:53	Great	Oaks Wastewater	T	
23	03:00		Influent Lines	Improper influent lines, rusted	
		4		structure	
24	03:05	4	Aeration Tank	Rusting structure, vegetation growth	
25	03:14	4	Aeration Tank	Vegetation growth in plant	
26	03:23		Aeration Tank	Rusting structure with vegetation	
		-	0.15.11	overgrowth	
27	03:33		Outfall	Pollution	
28	03:42	LH Wa	stewater		
29	03:46	4	Bar Screen	Severe corrosion, damaged screen	
30	03:55	-	Blower	Excessive building on blowers	
31	04:04		Clarifier	Weir trough off level and	
22	04.42	4	Character I B. Halter	submerged (nonfunctional)	
32	04:13		Chemical Building	Degraded structure, improper	
22	04:10	4	A anation Danie	repairs	
33	04:19	Danain	Aeration Basin	Improper protection, piping and rust	
34	04:28	Persin	nmon Ridge Wastewater	Description delication	
35	04:35		Lagoon	Damaged aerators, duckweed	
26	04.50	4	Lagaca Call	overgrowth	
36	04:50	4	Lagoon Cell	Duckweed overgrowth	
37	05:00	Carri	Contact Chamber Improper wiring, rust		
38	05:08	Cente	Ridge Water District 1	No consisting of chilering and	
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	Cente	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	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,
				chlorine and storage in same room
55	07:22		Well House	Obsolete and improperly installed
				dosing pump
56	07:30	Cente	r Ridge Water District 4	T
57	07:35		Well House	Damaged exterior
58	07:43		Well House	Exposed wiring
59	07:54		Well House	Exposed wiring on well head
60	08:00	Timbe	rland Wastewater	T
61	08:05		Influent Lift Station	Exposed wiring, improper piping,
		_		debris piles
62	08:14	_	Influent Lift Station Panels	Exposed wiring
63	08:23		Aeration Plant	Rusted steel, vegetation in plant,
	22.24			exposed wiring
64	08:31		Aeration Tankage	Holes rusted through, leaking
CF	00:30	_	A creation Tanks = -	wastewater
65	08:38		Aeration Tankage	Holes rusted through, leaking
	00:40	_	Country at Chause 5 :-	wastewater
66	08:48		Contact Chamber	Deteriorating structure, improper
				post-aeration, improper chemical
				storage

PDF	Time	Title	Facility	Status		
Page	Stamp					
67	09:00		Lagoon	Sludge filled, berm in poor condition		
68	09:05	River I	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	ın Wastewater	6.11011112 G651118		
75	10:00		Treatment Process Plant	Faulty electrical work & sloppy, insulated piping		
76	10:06		Chemical and Material Storage	Improperly stored chemicals and materials, poor housekeeping, rusted tankage		
77	10:15		Chemical and Material Storage	Improperly stored chemicals and materials, poor housekeeping, rusted tankage		
78	10:21		Influent Lift Station	Improper electrical service, improper equipment installation		
79	10:30	Kingsv	Kingswood Wastewater			
80	10:35		Treatment Plant	Rusted structures, overgrowth throughout the site		
81	10:43		Treatment Plant	Improperly stored chemicals, 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 storage, damaged piping		
87	11:33		Blower Housing & Treatment Plant	Damaged housing, maintenance failure		
88	11:45	1	Sludge Return Line	Improper installation and materials		
89	11:55	1	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













Brocklyn Wastewater













Golden Acres Wastewater

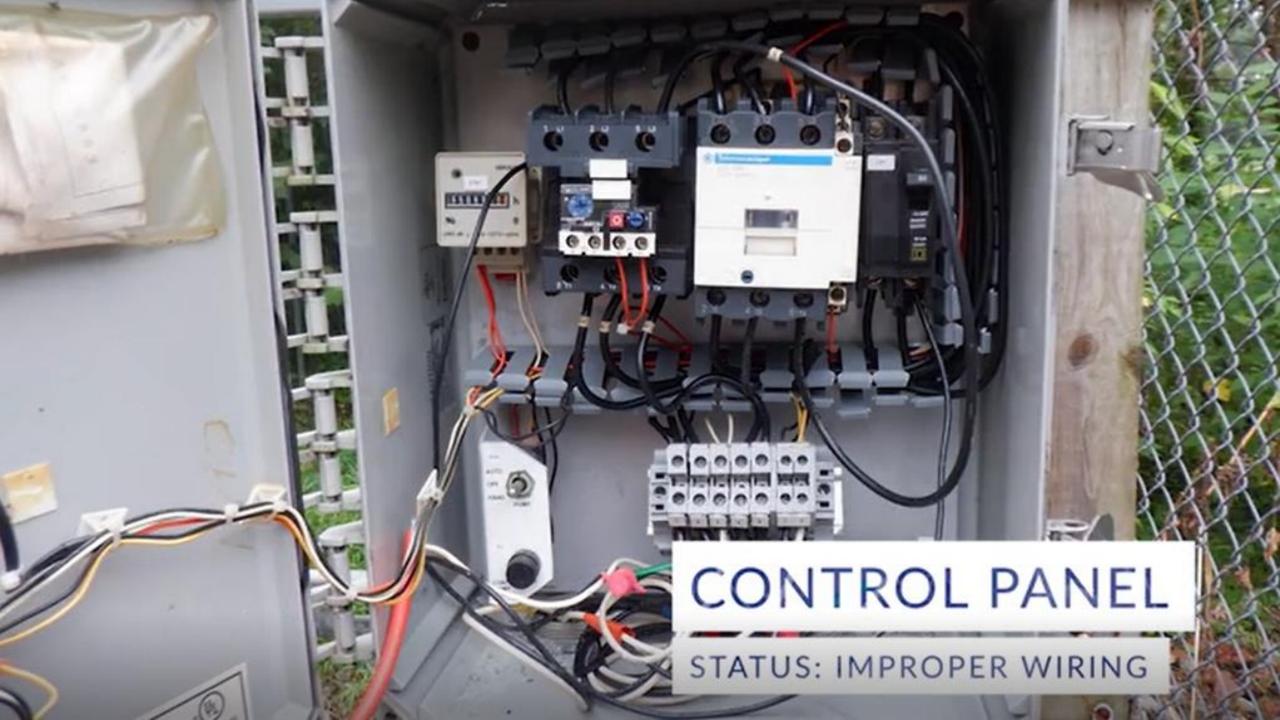




OUTFALL

STATUS: POLLUTION, EFFLUENT PIPE CLOGGED WITH DEBRIS





Great Oaks Wastewater











OUTFALL

STATUS: POLLUTION

LH Wastewater











Persimmon Ridge Wastewater







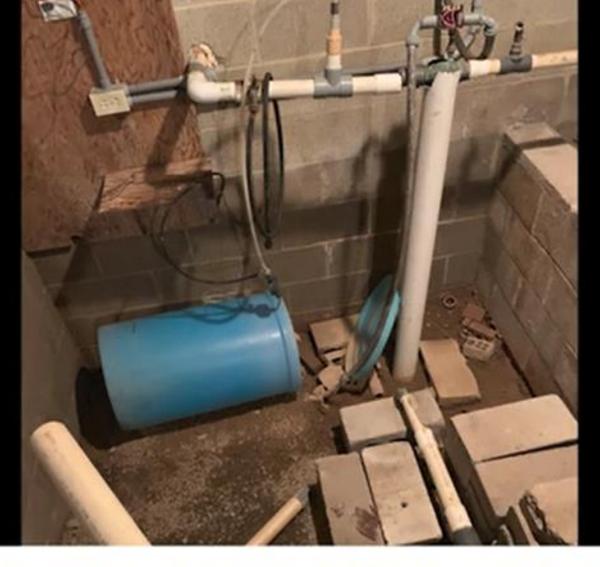


WELL HOUSE INTERIOR

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

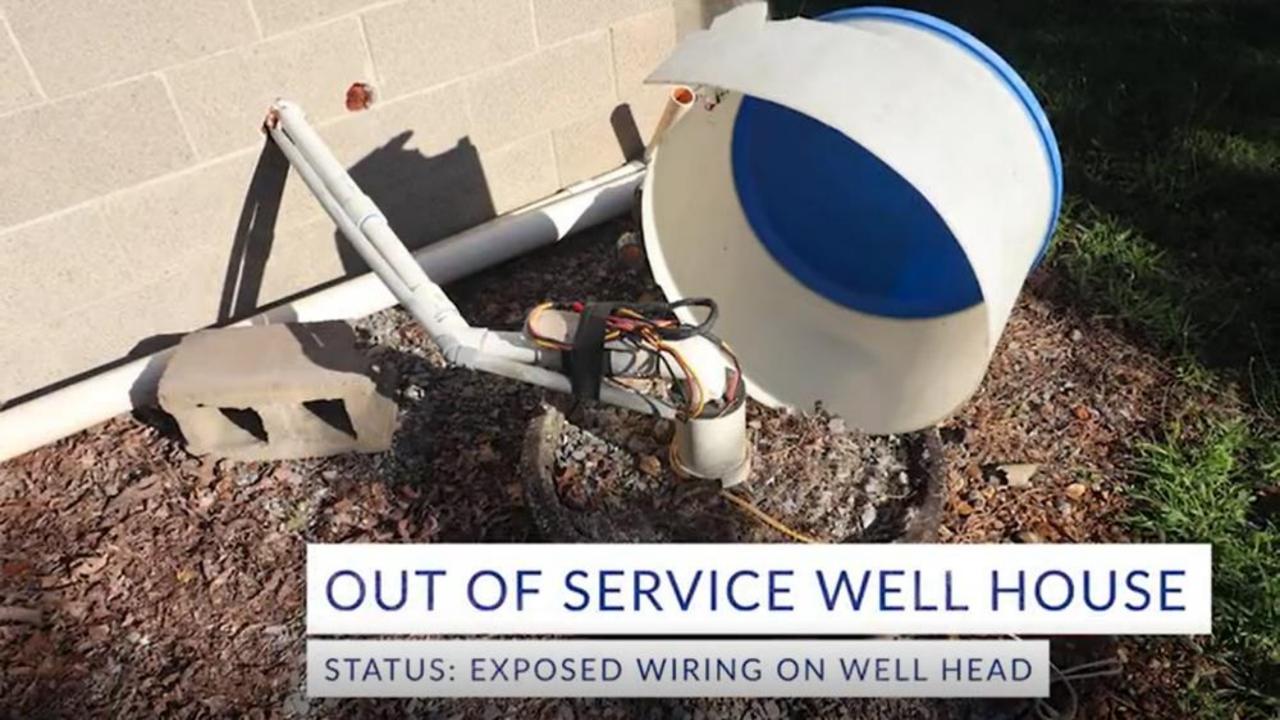


STATUS: OBSOLETE AND IMPROPERLY INSTALLED DOSING PUMP



OUT OF SERVICE WELL HOUSE

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

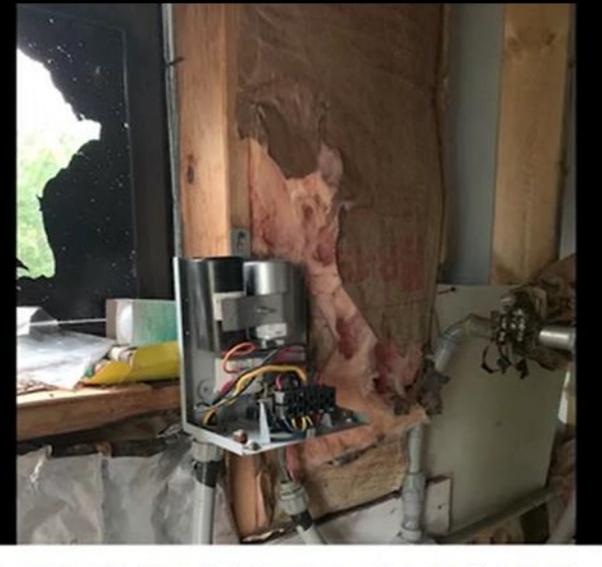




HYROPNEUMATIC TANK

STATUS: TANK HAS PINHOLE LEAKS AT ACTIVE WELL SITE





ACTIVE WELL HOUSE

STATUS: EXPOSED WIRING, DAMAGED INSULATION



STATUS: INSULATION DAMAGED, CHLORINE IN SAME ROOM AS STORAGE



STATUS: OBSOLETE AND IMPROPERLY INSTALLED DOSING PUMP, EXPOSED WIRING





STATUS: DAMAGED STRUCTURE, EXPOSED WIRING



STATUS: DAMAGED STRUCTURE, EXPOSED WIRING





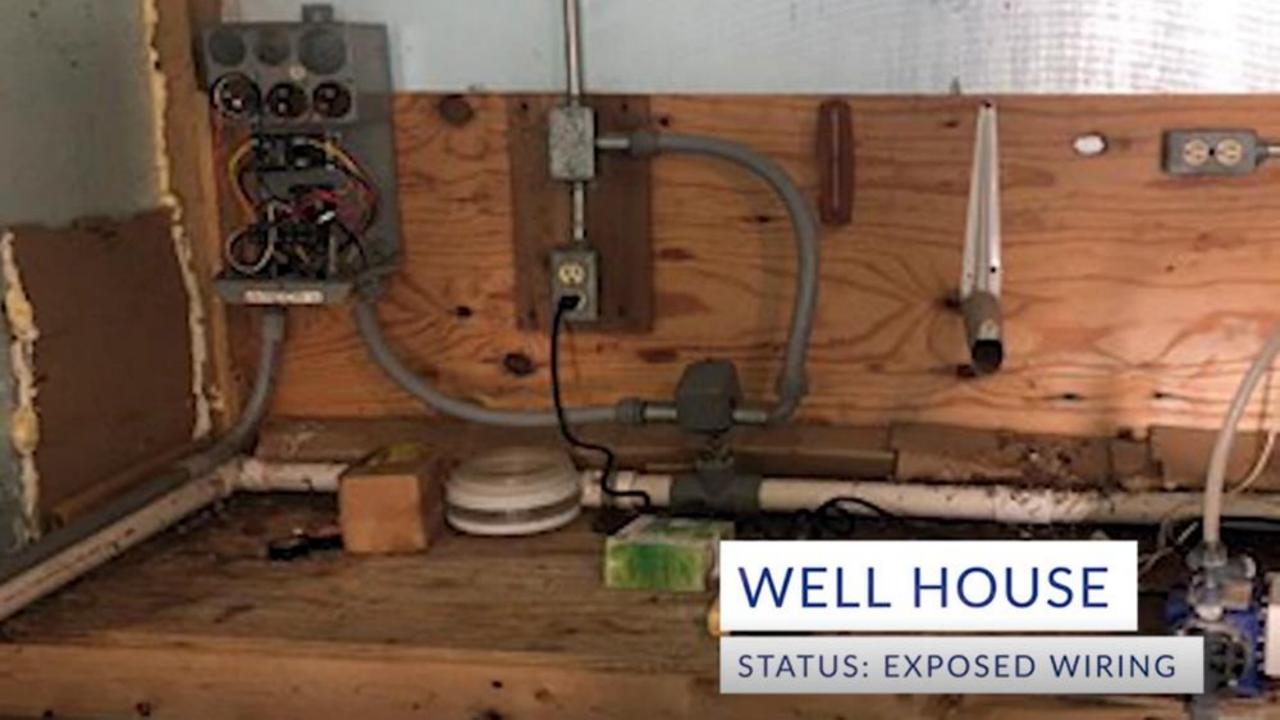
WELL HOUSE INTERIOR

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



STATUS: OBSOLETE AND IMPROPERLY INSTALLED DOSING PUMP

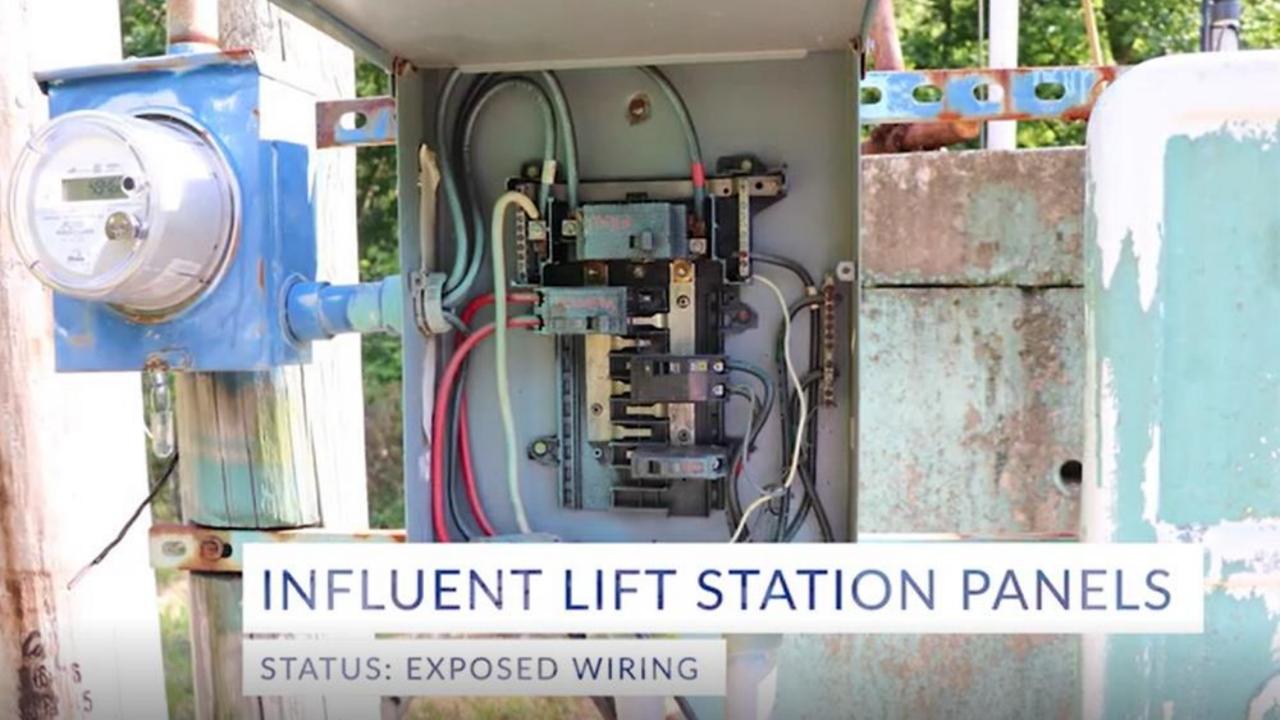






Timberland Wastewater















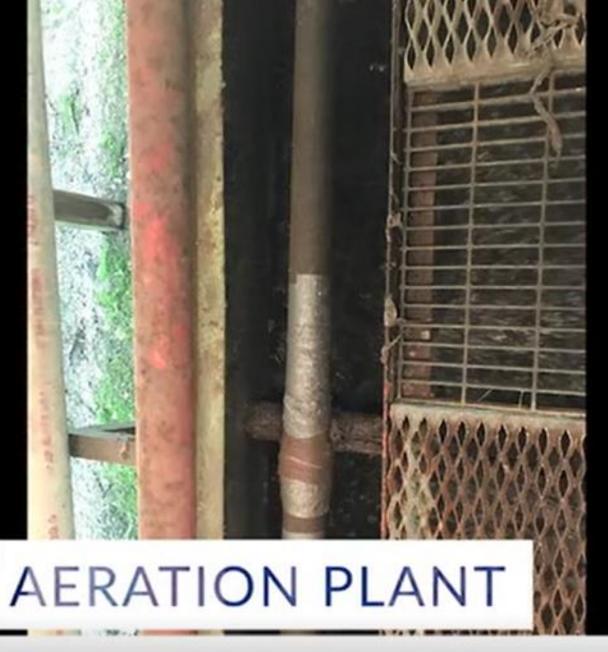
River Bluffs Wastewater



STATUS: IMPROPER INSTALLATION AND MATERIALS







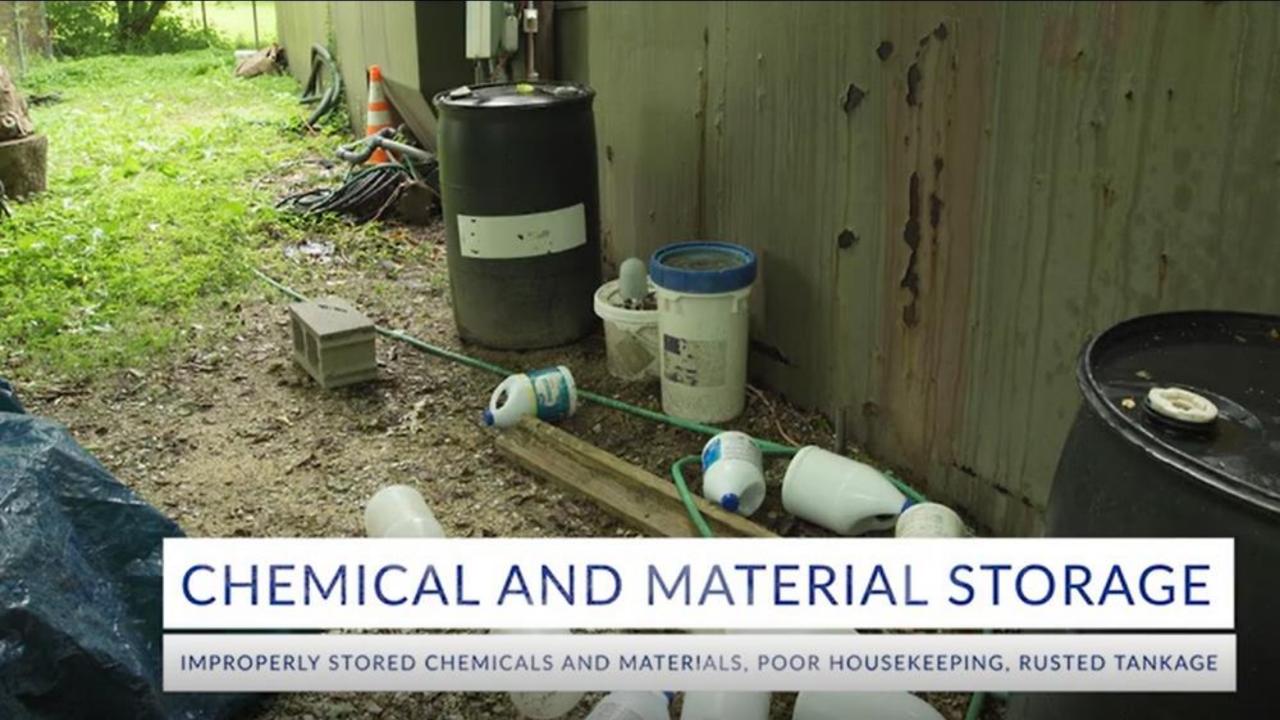
STATUS: STEEL LINES REPAIRED WITH DUCT TAPE

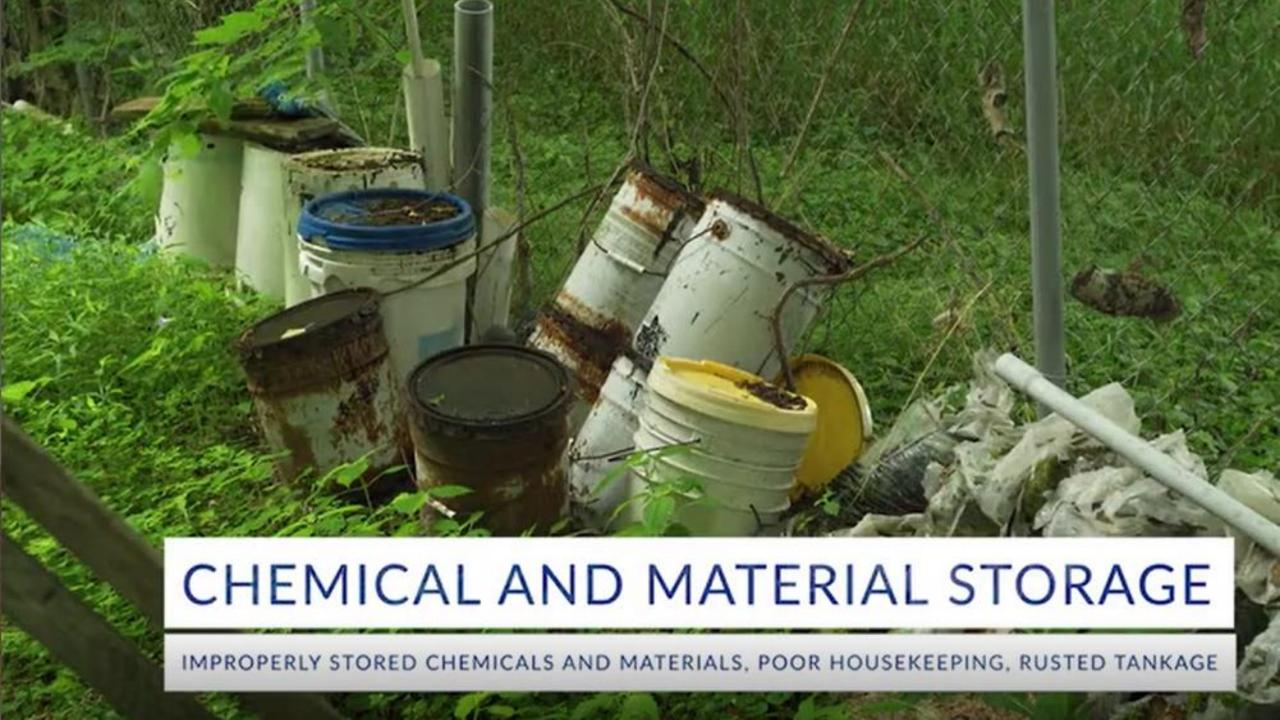


STATUS: EXCESSIVE CORROSION, IMPROPER CHLORINE DOSING

Fox Run Wastewater









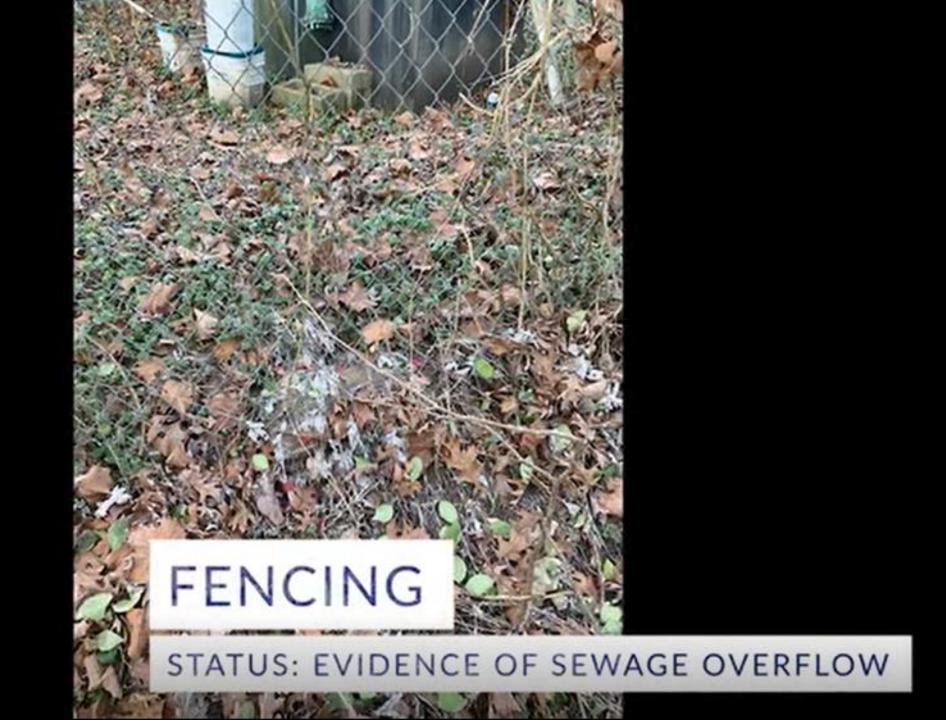
Kingswood Wastewater







Lake Columbia Wastewater















CentralStatesWaterResources.com