

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MADISON	)	CASE NO.
COUNTY UTILITIES DISTRICT FOR AN	)	2021-00218
ALTERNATE RATE ADJUSTMENT	)	

**MADISON COUNTY UTILITIES DISTRICT RESPONSE  
TO THIRD REQUEST FOR INFORMATION**

Comes now, Madison County Utilities District, through counsel, and for its response to the Commission’s third request for information and states as follows:

1. Please see attached for responses to Data Request #1, item 1a-d, e is answered by the information contained in item 1d.
2. The fiber optic cable installation project proposes to use water mains owned by Madison County Utilities District (MCUD) and Kirksville Water Association (KWA). All lines identified as MCUD in any attachments are owned by Madison County Utilities District.
3. MCUD has agreed to forgo any compensation related to the deployment of fiber optic lines in service of the CSEPP program and upgrade of the community emergency communications system. With the presence of the Bluegrass Army Depot and chemical munitions in Madison County, it is vital to the health and safety of the citizens of Madison County that the communication system be the most efficient available. MCUD’s Board of Directors believes part of its core mission is to provide whatever support necessary to protect the people of Madison County.

It has been discussed with the County and agreed by all that any future contracts with third-party providers of broadband service utilizing fiber optic in water lines will include compensation for MCUD and KWA for providing the lines.

4. There is one section on the Lexington Road run that uses 10” lines. The total run in 10” line is approximately 2,929 feet. The links are identified as Link21, Link22 and Link23 in the previously provided documentation labeled as **Attachment One – Madison Full Study.pdf**. This is the only 10” line in the project.
5. a. The operating pressure was collected from Madison County Utilities Personnel via their GIS and Telemetry Systems. Madison County Employees, Madison District Employees and CRALEY Engineers walked the entire length of both runs, working

together to pinpoint the valves, pull the operating pressures from the Madison Districts Systems about the specific area we were in.

5. b. The flow information was collected from Madison District Personnel via their GIS and Telemetry Systems. Madison County Employees, Madison District Employees and CRALEY Engineers walked the entire length of both runs, working together to pinpoint the valves, pull the flow data from the Madison District System data about the specific area we were in.
  
6. a. There are 22 hydrants on the Lexington Road portion of the project. There is one hydrant within 250 feet of the start of the run.
  
- b. Hydrant testing was performed by the Madison County Fire Department in 2020. The locations with no testing results are hydrants that do not belong to MCUD.

ADDRESS	STATIC PRESSURE	RESIDUAL PRESSURE	FLOW GPM/PSI
101 Interstate Dr	100	65	1200
3600 Lexington RD			
3533 Lexington Rd	90	80	1350
3506 Lexington Rd	90	70	1300
3322 Lexington RD			
3331 Lexington Rd			
100 White Hall Shrine RD			
3197 Lexington Rd	80	52	1170
3082 Lexington Rd	70	40	1060
2967 Lexington Rd	90	50	1170
2899 Lexington Rd	86	50	1190
2665 Lexington Rd	80	35	920
2635 Lexington Rd			
2601 Lexington Rd			920
2519 Lexington Rd			
2492 Lexington Rd	75	40	1000
2404 Lexington Rd	90	60	1000
2351 Lexington Rd	85	70	1060
2336 Lexington Rd	70	60	840
2323 Lexington Rd	60	45	920
Corner of Lex RD & Michelle DR			
Left property line 1001 Brandy Lane			
400' West of Goggins LN on Tates Creek			

7. Madison County asked the Impact to Hydraulic Regime be evaluated in the Full Study of each project. Page 61, Section 14 explains the impact to MCUD, and Page 67, Section 14 explains the impact to KWA. The Full Studies have been attached as Attachment One – Madison Full Study and Attachment Two – Kirksville Full Study in response to Staff’s Second Request for Information.
8. An engineer licensed in the Commonwealth of Kentucky has not reviewed the plans. Madison County and Madison District have discussed the impact to customers in depth with the Division of Water, CRALEY and the Madison District Staff. While the interruption to water during construction can be viewed as a nuisance the potential benefits most certainly out way the temporary discomfort.
9. The MOU contains the basic understanding between the parties that MCUD response time to leaks and repairs will not be impacted by the presence of fiber optic lines. There have been no test runs or other training that would inform a more detailed protocol, but it is anticipated that the provider of the system (CRALEY) will assist in the development of specific protocols. MCUD will notify designated personnel of the County when a repair must be done to a line that involves fiber optic. MCUD will proceed to repair their line and County personnel will follow with any service required for the fiber line. MCUD is a large service area and there is no “average” or set response time. MCUD maintains telemetry and other warning systems and has an employee on call 24/7 to respond to leaks and service calls.
10. It is not sure what is meant by alternative installation methods. If the question is related to other methods to install fiber optic cables in the area, then yes, please see the response to request 11. However, if the question is to installation of the fiber optic line in the water line itself, the County has only worked with CRALEY.
11. One technique that was explored were pole attachments. This would require the County to lease space on the poles. It is fiscally irresponsible for Madison County to sign a long-term lease for pole attachments when federal grants have been provided to deploy the fiber without requiring long term leases.  
The second technique considered was directional boring. Directional boring requires easements and bonds to cross under roadways not owned by Madison County. Additionally, the cost of deploying the entire run with directional boring is extremely high. The lowest bid for directional boring (labor only) was \$33.67 per foot without hitting rock and the price skyrockets to \$100.87 per foot where they encounter rock. The total cost per foot including materials would be \$39.32 per foot with no rock encountered, with rock encountered it is \$106.52 per foot.

Between the two projects we have an estimated 94,000 feet to deploy. If no rock were encountered, directional boring would cost approximately \$3,696,080.00. Common experience in Madison County is to expect at least 30% of a run to

encounter rock that must be cleared. In this project, that would equate to 28,200 feet of rock. The addition of rock would increase the cost of directional boring to \$5,623,076.00.

The County also considered trenching. The lowest bid received was \$33.67 per foot for labor and \$39.32 per foot with material equaling \$3,696,080.00 to complete the project by trenching. Again that price does not include additional costs for hitting rock nor the time, effort and expense of securing easements.

In contrast to the other three methods considered, the CRALEY method allows both runs to be completed in 28 days with no easements on bonds on roadways. The total cost to deploy the two projects using CRALEY deployment will be roughly \$1,223,183.00.

12. It is not clear that A Certificate of Public Convenience and Necessity would be required in this unique instance as no utility is being provided to the public. The initial phase of this project is for governmental use only. Additionally, MCUD is not constructing, extending, or improving any of its line. KRS 278.020 exempts MCUD from requiring A Certificate of Public Convenience and Necessity where there is no cost to MCUD for this project, it is neither extending or improving lines and there is no increase in fees to customers. Unless instructed otherwise, MCUD does not intend to file for a CPCN.
13. Madison County Fiscal Court, University of Kentucky, Scott County Fiscal Court and the City of Georgetown have created a Regional Public Safety Radio System called the Bluegrass Regional Radio Network (BRRN).

This system is designed to provide cost savings to all parties and provide the highest level of interoperability between all our jurisdictions. The goal is to offer connections to the BRRN to other counties in Kentucky. Expanding to other counties would reduce the cost of ownership of a next generation public safety system and promote interoperability among the Bluegrass Region of the Commonwealth.

The fiber optic connection between these facilities is important and required. The system will have two modes of communication. The primary mode of communication will be the fiber optic backbone which is the most reliable means of communication for a public safety radio system. The secondary means of communication is a OC3 wireless ring with multiple self-healing pathways for communication in the event of fiber loss.

We have reached out to Kentucky American Water about the need to utilize their lines to reach University of Kentucky through Fayette County and Scott County.

14. Staff attorney Brittany Koenig requested additional information regarding Data Request #1, item 4 and Data Request #2, item 5. In answer to Data Request #1, item 5

the number of ¾ inch meters installed for 2020 there were 115 installations and 35 drops. MCUD does not keep a record of the labor and materials used as each drop is a set price. There were five (5) 1-inch meters installed in 2020. The amounts expensed to install each 1-inch meter or larger were previously attached.

In response to Data Request #2, item 5, MCUD personnel are responsible for the meter drops.

All information provided in response to the Commissions' request are true and accurate to the best information and belief of all Madison County Staff, Madison County Utilities Staff and counsel who provided responses.

Respectfully submitted,

*Jud Patterson*

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