COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

Electronically Filed

In the Matter of:

ELECTRONIC APPLICATION OF THE) BREATHITT COUNTY WATER DISTRICT FOR) A CERTIFICATE FO PUBLIC CONVENIENCE) AND NECESSITY TO CONSTRUCT A WATER) SYSTEM IMPROVEMENTS PROJECT) PURSUANT TO THE PROVISIONS OF K.R.S.) 278.0202 AND 807 K.A.R. 5:001)

CASE NO. 2021-00400

RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO BREATHITT COUNTY WATER DISTRICT

Comes now the Applicant, Breathitt County Water District, hereinafter "the District", by and through its Chairman, Bobby Thorpe, Jr., and for its Response to the Public Service Commission's Initial Request for Information, states under oath as follows:

1. Provide copies of the Preliminary and Final Engineering Reports that were prepared by Nesbitt Engineering, Inc. (Nesbitt) for Breathitt District's proposed waterline extension project. If Nesbitt did not prepare the engineering reports, provide a detailed explanation as to why they were not prepared.

Response: Attached please find the Preliminary Engineering Report. The Funding Agency did not require a Final Engineering report.

2. Provide a detailed explanation of what alternatives to Breathitt District's proposed waterline extension project were considered and why they were not chosen.

Response: The areas proposed to be served are currently unserved. The alternatives considered to the proposed project are as follows:

- a. Not serving the areas and continuing to haul water;
- b. Phase the project into smaller projects;
- c. Drilling new wells;
- d. Serving the area from the District's system

Serving the proposed area from the District's system is the only viable alternative to provide clean and dependable water. Hauling water can easily contaminate the supple and wells are expensive to drill, maintain and operate, and can fail.

3. Provide an estimation of the number of customers that Breathitt District expects to add by building the proposed project.

Response: Twenty-eight (28) houses are expected to be added as customers.

4. Explain whether Breathitt District expects the proposed project to serve an area that could substantially increase the customer numbers.

Response: The project will not substantially increase the number of customers.

5. Provide the number of customers in the project area that have contracted for service from Breathitt District.

Response: None have contracted, but many have indicated interest in having water service.

6. Explain what these new potential customers currently use to obtain potable water.

Response: These potential customers currently use private wells and/or cisterns and some buy drinking water.

7. State the approximate age of the lines to be replaced by this project.

Response: The pumps and/or valves to be replaced were placed in service more than ten (10) years ago.

Respectfully Submitted,

Dawn R. Watts P.O. Box 944 Jackson, Kentucky 41339 Ph: 606-666-7725 Email: Counsel for Breathitt County Water District

STATE OF KENTUCKY)

COUNTY OF BREATHITT)

The affiant, Bobby Thorpe, Jr., being first duly sworn, states: that he is the Chairman of the Breathitt County Water District; that he has read the foregoing Responses to the Public Service Commission's Initial Request for Information and has noted the contents thereof; that the same are true of his own knowledge and belief, except as to matters which are herein stated to be based on information and belief, and that these matters he believes to be true and correct.

IN TESTIMONY WHEREOF, witness the signature of the undersigned on the UK day of December, 2021.

Bobby Thorpe, Jr., Chairman Breathitt County Water District

SUBSCRIBED, SWORN TO, AND ACKNOWLEDGED before me by Bobby Thorpe, Jr., Chairman of the Breathitt County Water District on this the <u>le Ho</u>day of December, 2021.

NOTARY PUBLIC, STATE AT LARGE My commission expires: <u>08-26-2024</u> Notary I.D. # <u>KYNP 13913</u>

Distribution List:

District Officials-

Bobby Thorpe, Jr., - Chairman Estill McIntosh - Manager Breathitt County Water District 1137 Main Street Jackson, Kentucky 41339 Ph. 606-666-3800

Engineer-

Paul Nesbitt Nesbitt Engineering, Inc. 227 North Upper Street Lexington, Kentucky 40507 Ph. 859-233-3111

Local Counsel-

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Dawn R. Watts P.O. Box 944 Jackson, Kentucky 41339 Ph. 606-666-7725 E-mail: drs.law@outlook.com DAWN R. WATTS NOTARY PUBLIC STATE AT LARGE KENTUCKY NOTARY ID# KYNP13913 MY COMMISSION EXPIRES AUGUST 26, 2024

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