COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of*:*

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS	)	**CASE NO. 2022-00216**

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S
RESPONSES TO COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

Bluegrass Water Utility Operating Company, LLC, ("Bluegrass Water" or the "Company") by counsel, files its responses to the Commission Staff's First Requests for Information, issued in the above-captioned case on September 15, 2022.

FILED: September 30, 2022

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 1: Refer to the Application, paragraph 18. State whether Bluegrass Water still plans to go forward with installation of the proposed remote monitoring equipment if the request for a modification of the inspection requirements is not granted.

RESPONSE: Based upon the efficiencies and cost savings provided by installation of remote monitoring equipment, the Company believes that installation of the proposed remote monitoring equipment and modification of the inspection requirements would best serve the Company's customers by allowing the Company to provide safe, reliable services at the lowest rates possible. In the event the Commission modifies or denies the request for a modification of the inspection requirements, the Company would reevaluate the efficiencies and cost savings in light of the Commission's rulings to determine the actions that would best serve its customers.

Witness: Todd Thomas

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REQUEST NO. 2: Explain in detail how the estimated annual Operation and Maintenance (O&M) cost of $41,303.08 for the remote monitoring equipment was calculated, providing an itemized list of every expense factored into the annual cost.

RESPONSE: **The $41,303.08 does not represent O&M cost, but instead represents the annual cost recovery for placing remote monitoring equipment into rate base. This amount is based on total capital of approximately $230,100 and depreciation and return on revenue costs of approximately $23,010 and $18,293, respectively. Please also see Exhibit 24 to the Application.**

Witness: Brent Theis

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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REQUEST NO. 3: State whether Bluegrass Water intends to seek recovery of the expenses related to the proposed Certificate of Public Convenience and Necessity (CPCN) in future rate cases involving the individual utilities that would receive the remote monitoring equipment.

RESPONSE: Assuming the Commission approves the CPCN, Bluegrass Water anticipates that it would seek recovery of the expenses of the remote monitoring equipment through its unified rate, and would likewise seek recovery of these expenses for any individual utilities that have not yet been transitioned to Bluegrass Water's unified rate.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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REQUEST NO. 4: Refer to the Application, paragraph 44. State whether Bluegrass Water considered any other alternatives to the proposed remote monitoring equipment other than "maintaining the status quo" of conducting daily inspections.

RESPONSE: Bluegrass Water carefully weighed its options in deciding whether to pursue a remote monitoring equipment project and if so, which company to select for its remote monitoring equipment. It carefully investigated the status quo and ultimately concluded that it does not serve its customers as well as remote monitoring would.

Foregoing a remote monitoring project would reduce the likelihood that the Company could act quickly and proactively in preventing issues before they affect customers. Instead, the Company would only be able to respond to issues reactively and potentially only after receiving an urgent call from a customer. In other jurisdictions where the Company has installed remote monitoring equipment, the Company has seen that the proposed remote monitoring equipment provides a similar level of visibility into plant operations as daily site visits. Thus, maintaining the status quo of conducting daily inspections would diminish the quality of service the Company is able to provide at a higher cost, when compared to the installation of remote monitoring equipment.

Given remote monitoring's cost-saving and service-enhancing benefits, the Company researched different remote monitoring companies to find the best value for its needs and its customers.

Witness: Todd Thomas

REQUEST NO. 5: Refer to the Application, paragraph 44, where it states that Bluegrass Water "would lose the economies of scale that result from having all of its systems using remote monitoring."

a. Quantify the annual savings anticipated from having every Bluegrass Water's Wastewater Treatment Plant (WWTP) use remote monitoring equipment.

b. Quantify the annual savings for only the systems who already have such remote monitoring equipment installed.

RESPONSE:

(a) Please see the attached Exhibit 1-5(a) provided herewith. The estimated cost savings included within Exhibit 1-5(a) account for updated estimates provided by High Tide since the filing of the Application, which continue to result in cost savings to the Company.

(b) We are unable to quantify the annual savings for only systems who already have such remote monitoring equipment installed because the estimated costs are subject to change if only a portion of the systems are included because the pricing terms per system offered by High Tide would be less favorable if only a portion of the systems were included.

Witness: Brent Theis

Bluegrass Remote Monitoring
DR 5 - Annual Savings

Ref:			
DR 24	Enforcement Cost savings	$	(10,503)
Exhibit 24	3 days/week site visit annual cost savings	$	(274,272)
Exhibit 24	Rate Base Cost Recovery	$	41,303
	Annual Subscription Cost for Remote Monitoring equipment	$	13,373
	Total Annual Savings	**$**	**(230,099)**

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REQUEST NO. 6: Refer to the Application, paragraph 48, where it states that High Tide offers more variety in terms of remote monitoring equipment than Mission, and therefore "provides a better economy of scale when units are consolidated." Quantify the annual savings that will be realized by Bluegrass Water and explain how these savings were calculated.

RESPONSE: High Tide offers more sensor inputs without having to purchase expensive expansion packs, which would be the case for Mission units. In addition, on an initial capital investment basis, the High Tide units are $500.00 less expensive per unit, and the annual service charge for High Tide is $123.00 less than Mission for each RTU (remote terminal unit). Assuming the Company's application is granted, the Company would have 42 total RTUs installed in Kentucky, resulting in total annual savings for service charges of $5,166.00, initial capital savings of $8,000, as well as ongoing capital expenses that will be saved by not having to purchase expansion packs.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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REQUEST NO. 7: Refer to the Application, paragraph 50, where it states that High Tide offers satellite connections which make it easier to receive communications from rural areas. Confirm that Mission does not offer similar satellite connections. If Mission does offer satellite connections, state whether there is any difference in either cost or quality when compared to High Tide's satellite connections.

RESPONSE: Confirmed. Mission does not offer satellite connections.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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REQUEST NO. 8: Refer to the Application, paragraph 38, in which it states that Bluegrass Water has existing remote monitoring equipment at its other Kentucky WWTPs. Confirm that Bluegrass Water purchased its existing remote monitoring equipment from Mission, as stated in Case No. 2020-00290.

RESPONSE: Yes, the Company confirms that it purchased its existing remote monitoring equipment from Mission, as stated in Case No. 2020-00290.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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REQUEST NO. 9: State when Bluegrass Water installed remote monitoring equipment at its remaining WWTPs.

RESPONSE: Bluegrass Water has not previously installed additional remote monitoring equipment, other than as was disclosed to the Commission in Case No. 2020-00290. Bluegrass Water seeks a CPCN in this proceeding to install remote monitoring equipment at its remaining WWTPs.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 10: If Bluegrass Water has equipment manufactured by any company other than Mission, state why Bluegrass Water did not consider purchasing from that manufacturer in the present application.

RESPONSE: Bluegrass Water has previously installed only Mission Units and does not have remote monitoring units from any other manufacturers.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 11: If Bluegrass Water did purchase its remote monitoring equipment for its remaining WWTPs from Mission, explain why it did not purchase from High Tide previously.

RESPONSE: Bluegrass Water has not purchased remote monitoring equipment for its remaining WWTPs from Mission. Bluegrass Water seeks a CPCN in this proceeding to install remote monitoring equipment for its remaining WWTPs, and believes that purchasing such equipment from High Tide, as opposed to Mission, is the most prudent alternative for the reasons set forth in the Application and its Response to Request Nos. 1-6 and 1-7.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 12: Explain what factors have changed since Bluegrass Water purchased monitoring equipment from Mission that has caused it to decide to now purchase remote monitoring equipment from High Tide.

RESPONSE: Based upon experiences working with Mission over multiple jurisdictions, the Company determined that Mission service was poor, and technical support was unsatisfactory. As a result, the Company identified High Tide as a better and less expensive alternative, that also provides more connectivity, including satellite connectivity. Additionally, the Company has identified opportunities to do further processing of remote monitoring data with High Tide's services, whereas the Mission platform does not provide a means for easily extracting data. Based upon experiences in other jurisdictions, High Tide has proven to provide much better service and more responsive technical support. High Tide has also already been working with Bluegrass Water personnel to develop methods for making the remote monitoring even more valuable to our customers.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 13: Provide any additional costs that will be incurred to incorporate the Mission remote monitoring equipment with High Tide remote monitoring equipment.

RESPONSE: Other than the slight modifications required to be made to the existing remote monitoring equipment to ensure functionality on the High Tide system, there are no additional costs to incorporate Mission remote monitoring equipment with High Tide remote monitoring equipment.

Witness: Brent Theis

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 14: Refer to the Application, paragraph 52, in which it states that "the ability to slightly modify the Company's existing remote monitoring equipment by replacing a small component in order to enable functionality on High Tide's system will help protect the investment already made. . ." State whether any savings could be realized by purchasing Mission remote monitoring equipment, thereby eliminating the need to modify the older Mission equipment to make it compatible with the newer High Tide equipment, as is proposed in the application.

RESPONSE: When combining the higher cost of each Mission unit, higher annual service costs, and costly expansion pack costs imposed by Mission, as well as the limited connectivity options, poor technical support, and unsatisfactory service offered by Mission, Bluegrass Water respectfully submits that purchasing Mission equipment and eliminating the need to modify older Mission equipment would not lead to overall cost savings or best serve Bluegrass Water or its customers.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 15: Refer to the Application, paragraph 51, where Bluegrass Water states that it compared High Tide and Mission regarding both hardware costs and annual service agreement costs. State the actual estimated costs for hardware and annual service agreements for both High Tide and Mission.

RESPONSE: Up front hardware costs for High Tide are $500 less per RTU than Mission. Total savings on High Tide units to be installed, based upon the relief requested in this proceeding, is $8,000. The annual savings on service charges is $5,166.00.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 16: Refer to the Application, paragraph 53, in which Bluegrass Water states that it determined installing High Tide remote monitoring equipment at the listed locations in the application would result in "significant cost savings." Provide the savings being achieved by installing High Tide remote monitoring equipment.

RESPONSE: The cost savings for purchase of the remote monitoring units is $8,000 and the total annual service cost savings is $5,166.00. In addition, the results achieved through satellite communication, better technical support, more responsive customer service, and access to additional data provided by High Tide will allow Bluegrass Water to provide higher quality services and quickly act to mitigate or prevent possible issues that will result in additional long-term cost savings. Please also see Company's Response to Request No. 1-6.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 17: Compare the savings achieved by installing High Tide equipment with the cost for Omni, Mission, or any other manufacturer of remote monitoring equipment that Bluegrass Water currently has in place at its remaining Kentucky WWTPs.

RESPONSE: **Please see Company's Response to Request No. 1-6.**

Witness: **Todd Thomas**

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 18: Refer to the Application, paragraph 64. Provide the itemized calculations Bluegrass Water used to arrive at the estimated annual O&M expense of $1,126,000 that would result from daily inspection requirements.

RESPONSE: The Company arrived at the estimated annual O&M expense associated with daily inspections of $1,126,000 by taking the monthly consolidated O&M expense for all currently owned systems in Kentucky ($93,856.63) and annualizing that expense by multiplying the value by 12 months.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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REQUEST NO. 19: Quantify what portion of that estimate is related to the proposed electronic monitoring equipment.

RESPONSE: No portion of the estimated annual O&M expense calculation in response to Request No. 1-18 is directly related to the proposed monitoring equipment. The monthly expense is the amount charged by the Company's third-party operations contractor for daily inspections. The amount is therefore indicative of annual O&M cost savings that could be realized if remote monitoring equipment is installed and the waiver request is granted.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 20: State what Bluegrass Water's annual O&M expenses would be if this CPCN application is not approved, therefore assuming daily inspections will continue and eliminating any additional O&M expenses related to the electronic monitoring equipment.

RESPONSE: If this CPCN Application is not approved, the Company's annual O&M expenses for daily inspections would be an estimated $1,126,000. Please also see the Company's Responses to Request Nos. 1-18 and 1-19.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 21: Refer to the Application, paragraph 65. Provide the calculations Bluegrass Water used to arrive at the estimated $275,000 in annual O&M savings it states it would realize if Bluegrass Water were permitted to inspect its WWTPs three times per week, as proposed in the application.

RESPONSE: Bluegrass Water arrived at an estimated $275,000 in annual O&M savings by annualizing the estimated monthly savings in O&M expenses of $22,856.63. The costs savings were annualized by multiplying the monthly savings by 12 months. For a further breakdown of monthly savings in O&M expenses resulting from the relief requested, please see Exhibit 24 attached to the application.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
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REQUEST NO. 22: Refer to the Application, paragraph 66. Provide the calculations Bluegrass Water used to arrive at the estimated $1,165,000 in net savings over a five-year period should the application be approved.

RESPONSE: The Company subtracted the estimated annual cost of operating the proposed remote monitoring equipment ($41,303) from the annual estimated savings ($275,000) to determine an annual net savings of approximately $233,000 per year. This value was then multiplied by 5 years to estimate the net savings over a five-year period.

Witness: Todd Thomas

REQUEST NO. 23: Refer to the Application, paragraph 44. State the number of incidents for each of Bluegrass Water's WWTPs that do not presently have remote monitoring equipment where Bluegrass Water discovered a mechanical problem only after being notified by a customer who was affected the problem in question.

a. State the date and time of any such incident and provide a summary of what occurred.

b. State whether any incident listed could have been prevented if remote monitoring equipment had been available in lieu of daily inspections at the WWTP.

RESPONSE: **Please see the attached Exhibit 1-23 provided herewith.**

Witness: **Todd Thomas**

Date	Situation	Locations	Details	Corrective Action	RM Prevention
7/27/22 12:00 AM	Issue with Lift Station	Collection System	Custmer called to advise that the lift station by his house is alarming and the red light is on.	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
6/3/22 12:00 AM	Issues with mechanical process at WWTP	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/18/22 12:00 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/31/22 12:00 AM	Issues with mechanical equipment WWTP	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
8/5/22 12:00 AM	Issues with mechanical equipment WWTP	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/21/20 3:25 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/14/20 1:51 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/24/20 8:30 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
4/17/20 4:47 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
4/21/20 12:10 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/6/20 7:44 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/10/20 10:41 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/10/20 10:43 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/17/20 6:55 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/22/20 12:21 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
8/3/20 10:59 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
10/7/20 11:16 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
10/27/20 8:34 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/4/20 6:08 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/20/20 8:21 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/22/20 10:04 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/28/20 5:22 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
4/20/21 5:46 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
6/15/21 10:12 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/19/21 5:17 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/4/21 1:41 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/7/22 8:25 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/20/22 7:20 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
6/18/22 8:20 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.

6/28/22 9:29 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/18/22 7:21 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/31/22 10:58 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
8/4/22 7:57 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
8/10/22 2:46 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/7/22 5:14 PM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/30/20 8:37 AM	Blower at WWTP non-operational.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/21/20 4:06 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
2/10/20 9:28 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
2/10/20 9:35 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
2/10/20 9:37 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
2/10/20 9:40 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
2/10/20 9:57 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
2/29/20 12:49 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/3/20 10:39 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/16/20 9:15 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/24/20 8:23 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/24/20 8:24 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/24/20 8:25 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/24/20 8:26 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/18/20 1:10 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/9/20 10:53 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/10/20 2:37 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/17/20 8:19 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/17/20 8:20 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/27/20 6:53 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/27/20 7:14 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
8/31/20 8:57 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/18/20 3:24 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/21/20 9:35 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.

10/14/20 1:55 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
10/14/20 2:15 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
10/20/20 8:41 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
10/20/20 9:07 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
10/25/20 6:27 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
10/25/20 6:35 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/8/20 5:53 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/12/20 5:35 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/12/20 6:18 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/29/20 6:46 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/29/20 6:50 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/29/20 7:04 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/29/20 7:37 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/30/20 7:58 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/5/20 7:03 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/14/20 7:33 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/14/20 7:39 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/16/20 4:51 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/20/20 7:36 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/28/20 6:46 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/30/20 7:55 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/3/21 9:44 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/4/21 10:22 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/11/21 8:50 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/11/21 8:55 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/27/21 7:25 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
2/10/21 10:20 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/5/21 4:25 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/5/21 4:26 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/21/21 6:59 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.

4/11/21 9:54 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
4/11/21 10:33 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
4/22/21 4:58 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
4/28/21 8:50 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
4/30/21 7:36 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/2/21 6:36 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/2/21 6:50 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/2/21 7:23 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/6/21 7:15 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/6/21 7:28 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/23/21 5:28 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/24/21 6:02 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/25/21 8:31 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/25/21 10:30 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/25/21 10:59 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/25/21 11:15 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/26/21 8:20 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/31/21 9:37 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
6/7/21 8:06 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
6/8/21 9:02 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
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6/21/21 8:04 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
6/21/21 9:26 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
6/29/21 8:43 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/13/21 10:02 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/19/21 12:42 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/26/21 8:51 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/12/21 8:31 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/19/21 7:07 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/20/21 10:44 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.

9/21/21 9:05 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/22/21 7:32 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
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11/22/21 10:39 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/1/21 8:45 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/8/21 3:31 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/11/21 12:29 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/17/21 10:54 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/26/21 3:46 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/2/22 8:42 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/3/22 7:56 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/14/22 7:20 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/22/22 3:15 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
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4/28/22 6:30 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.

4/30/22 10:40 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/2/22 7:10 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/10/22 4:41 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/11/22 5:44 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/18/22 8:25 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
6/1/22 3:03 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
6/27/22 1:00 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
6/29/22 10:06 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/11/22 2:15 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
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7/27/22 1:59 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
8/11/22 10:48 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
8/15/22 7:00 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
8/26/22 9:37 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/6/22 8:25 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
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9/22/21 10:16 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/27/21 9:01 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
11/30/21 8:02 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/7/21 3:03 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
1/1/22 10:56 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/8/22 7:45 AM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
4/26/22 10:28 PM	Issue with Lift Station	Collection System	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
9/21/20 12:22 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/8/20 8:02 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/8/20 8:02 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/5/21 4:23 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/7/21 7:38 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.

3/14/21 9:45 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/21/21 9:56 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/21/21 10:00 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
3/22/21 7:22 AM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/3/21 9:40 AM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/6/21 9:26 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
5/16/21 5:55 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
7/25/21 9:01 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.
12/19/21 9:17 PM	Issue with Pump.	WWTP	Mechanical Equipment Issues	Operator was dispatched to perform maintenance.	Operator could have recieved alarm sooner.

REQUEST NO. 24: Refer to Application, paragraph 41, which states that "Remote monitoring also drives down the cost of environmental compliance by reducing the frequency, likelihood, and severity of potential violations."

a. Explain how remote monitoring drives down the costs of environmental compliance.

b. Quantify all cost savings and explain how they were quantified.

RESPONSE:

(a) Remote monitoring drives down costs related to environmental compliance by helping to prevent instances of noncompliance from occurring. This happens in two main ways. First, by providing active, continuous data on the operations of facilities, operators and operations oversight personnel have better information to utilize in the basic operations of a facility. With better information, operators are more likely to identify issues in plant operation and make adjustments or correct these issues before this can result in an exceedance of permitted limits or other environmental violation.

The second way that remote monitoring prevents noncompliance is by providing operators with immediate notification when equipment malfunctions and breakdowns occur. This allows operations staff to respond immediately to abnormal operating conditions and often results in problems being resolved before they can impact facility operations (for example if a blower malfunctions and an operator is immediately alerted, they can often bring it back online before the treatment in the plant has been compromised and prevent effluent limit violations of BOD or Ammonia) or before an issue can result in a sanitary

sewage overflow (SSO) (for example if a lift station pumping system fails and operator is immediately alerted, they can repair the lift station, connect emergency power, or bypass pump the lift station with a mobile pump before the lift station can overfill resulting in an SSO or cause backups into customer homes and service interruption). Effluent violations and SSOs typically require some response to the state and can result in fines.

By preventing violations from occurring, the remote monitoring systems help to eliminate the possibility of fines associated with enforcement action and the overhead costs associated with man-hours and expertise required to respond to formal or informal enforcement action.

(b) While difficult to quantify, some estimates in the reduction in costs associated with noncompliance following the installation of remote monitoring can be formulated. Following system rehabilitation, a system with remote monitoring installed should be able to prevent the vast majority of noncompliance, however, to remain conservative in the estimation, we will assume that only 50% of instances of noncompliance can be prevented and we will disregard violations which do not result in enforcement action. The record of noncompliance over the previous 5 years of facility operations for the 15 NPDES regulated facilities that the Company owns in Kentucky have been reviewed as a baseline for the operation of the system without remote monitoring systems in place. Three main data points were analyzed for cost reduction where they can be accurately evaluated. Most obviously, the fines/penalties issued to these facilities over the last 5 years were $21,450. Assuming that

improved operations with remote monitoring can only eliminate half of these results in a direct projected savings of $10,725 over 5 years. Please also see the attached Exhibit 1-24 provided herewith.

The next areas evaluated were informal enforcement actions and formal enforcement actions. Each of these events, whether or not they result in fines, require man-hours from experts to resolve which would otherwise not occur if the violations did not occur. Given our experience in the state, the Company considers Informal Enforcement Actions to require a minimum of 6 hours of work from an engineer or equivalent level of expertise employee, and Formal Enforcement Actions to require a minimum of 12 hours of work. The time invested in responding to enforcement actions consists of time spent meeting with enforcement representatives in person or remotely, research and analysis into what issues caused the violation at the facility, what corrective actions may be required to resolve the issues, writing a response to the enforcement action, completing the required corrective actions, and writing again to update and close out an enforcement action. To be clear these can often require more time than this; however, in keeping with conservative estimates, minimum time estimates will be used. The assumed hourly rate was based upon rates from operations and engineering professionals available to the Company and was set at the minimum available rate of $70 per hour. This estimate conservatively simplifies and reduces the actual savings by assuming that any field work can be completed by operations staff in the course of their

regular duties and by not including any legal costs associated with lawyers which would likely be involved in any formal enforcement case.

The 15 systems have incurred a total of 157 informal enforcement actions over the last 5 years. Conservatively assuming that remote monitoring can work to eliminate half of these violations that would result in a reduction of 471 hours of work, coming to a reduction of $32,970 over 5 years. The 15 systems have incurred a total of 21 formal enforcement actions over the last 5 years. Conservatively assuming that remote monitoring can work to eliminate half of these violations would result in a reduction of 126 hours of work, coming to a reduction of $8,820 over 5 years.

Accordingly, even using the conservative approach described above, the reductions in costs arising out of enforcement actions are estimated to be $52,515 every 5 years (or $10,503 per year) but would likely actually result in even more savings due to the conservative assumptions made in the calculation above.

Witness: Todd Thomas

FacName	RegistryID	FacSNCFlg	FacQtrsWithNC	FacInformalCount	FacFormalActionCount		FacTotalPenalties		FacMapFlg
AIRVIEW WWTF	1.10E+11	N	4	9	2	$	2,000	Y	
BROCKLYN UTILITIES LLC	1.10E+11	N	7	9	1	$	-	Y	
DARLINGTON CREEK HOA SU	1.10E+11	N	9	4	1	$	-	Y	
DELAPLAIN DISPOSAL	1.10E+11	N	9	16	2	$	5,000	Y	
FOX RUN WWTF	1.10E+11	N	5	11	1	$	-	Y	
GOLDEN ACRES WWTF	1.10E+11	N	10	14	1	$	-	Y	
GREAT OAKS WWTF	1.10E+11	Y	10	20	3	$	-	Y	
HERRINGTON HAVEN SUBDI'	1.10E+11	N	10	10	1	$	-	Y	
KINGSWOOD WWTF	1.10E+11	N	6	7	1	$	-	Y	
LAKE COLUMBIA WWTF	1.10E+11	N	4	9	1	$	-	Y	
LH WWTF	1.10E+11	N	7	8	2	$	4,000	Y	
PERSIMMON RIDGE WWTF	1.10E+11	N	4	8	2	$	10,450	Y	
RIVER BLUFFS WWTP	1.10E+11	N	5	10	1	$	-	Y	
TIMBERLAND SUBDIVISION \	1.10E+11	N	10	9	1	$	-	Y	
WOODLAND ACRES	1.10E+11	Y	11	13	1	$	-	Y	
			Total	157	21	$	21,450		
			50%	78.5	10.5	$	10,725		
		hrs per incident (conservetive)		6	12				
$70	Hourly Rate Responding professional		total hrs	471	126				
			Profesional cost	$32,970	$8,820	$	10,725		$52,515 TOTAL 5 yr
									$10,503 TOTAL per year

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
CASE NO. 2022-00216

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 25: Provide a list of all mechanical equipment at each facility (including, but not limited to, any lift stations), and state whether all such mechanical equipment at each location is currently being inspected daily. If any equipment at any facility is not being inspected daily, explain why not.

RESPONSE: For a list of all mechanical equipment at each facility (including, but not limited to, any lift stations), please see the attached Exhibit 1-25 provided herewith. All mechanical equipment included in the attached Exhibit is currently being inspected daily.

Witness: Todd Thomas

AccountName	AssetClass	AssetDescription
KY - Airview - BGUOC	Blower Unit	Blower & Motor 1 - BG - AV - WWTP
KY - Airview - BGUOC	Blower Unit	Blower & Motor 2 - BG - AV - WWTP
KY - Airview - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - AV - WWTP
KY - Airview - BGUOC	Control Panel/MCC	Control Panel/MCC - BG - AV - WWTP
KY - Airview - BGUOC	De-Chlorination System	De-Chlorination System - BG - AV - WWTP
KY - Airview - BGUOC	Flow Meter	Flow Meter - BG - AV - WWTP
KY - Airview - BGUOC	Lift Stations	Lift Station - BG - Airview
KY - Airview - BGUOC	Pump	Pump 1 - LS - BG - Airview
KY - Airview - BGUOC	Pump	Pump 2 - LS - BG - Airview
KY - Airview - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Airview - WWTP
KY - Arcadia Pines - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Arcadia Pines
KY - Brocklyn - BGUOC	Blower Unit	Blower & Motor 1 - BG - BR - WWTP
KY - Brocklyn - BGUOC	Blower Unit	Blower & Motor 2 - BG - BR - WWTP
KY - Brocklyn - BGUOC	Control Panel/MCC	Control Panel/MCC - BG - Brocklyn
KY - Brocklyn - BGUOC	De-Chlorination System	De-Chlorination System - BG - BR - WWTP
KY - Brocklyn - BGUOC	Lift Stations	Lift Station - EFF LS - Brocklyn
KY - Brocklyn - BGUOC	Aerator	Mist Aerator - BG - BR - WWTP
KY - Brocklyn - BGUOC	Pump	NEW PUMP [CHANGE NAME]
KY - Brocklyn - BGUOC	Pump	Pump 1 - BG - Brocklyn - Effluent LS
KY - Brocklyn - BGUOC	Pump	Pump 2 - BG - Brocklyn - Effluent LS
KY - Brocklyn - BGUOC	Flow Meter	Ultrasonic Effluent Flow Meter - BG - BR - WWTP
KY - Brocklyn - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Brocklyn - WWTP
KY - Carriage Park - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Carriage Park
KY - Center Ridge - Water District 1 - BGUOC	Chemical Storage Tank	Chemical Storage Tank - BG - CR - Water District 1
KY - Center Ridge - Water District 1 - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - CR - Water District 1
KY - Center Ridge - Water District 1 - BGUOC	Generator	Generator - BG - CR - Water District 1
KY - Center Ridge - Water District 1 - BGUOC	Water Storage Tank	Water Storage Tank 1 - BG - CR - Water District 1
KY - Center Ridge - Water District 1 - BGUOC	Water Storage Tank	Water Storage Tank 2 - BG - CR - Water District 1
KY - Center Ridge - Water District 1 - BGUOC	Water Treatment Plant	Water Treatment Plant - BG - Center Ridge - Water District 1 - WTP
KY - Center Ridge - Water District 1 - BGUOC	Well Head	Well Head - BG - CR - Water District 1
KY - Center Ridge - Water District 2 - BGUOC	Chemical Storage Tank	Chemical Storage Tank - BG - CR - Water District 2 - WTP A
KY - Center Ridge - Water District 2 - BGUOC	Chemical Storage Tank	Chemical Storage Tank - BG - CR - Water District 2 - WTP B
KY - Center Ridge - Water District 2 - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - CR - Water District 2 - WTP A
KY - Center Ridge - Water District 2 - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - CR - Water District 2 - WTP B
KY - Center Ridge - Water District 2 - BGUOC	Control Panel/MCC	Control Panel/MCC - BG - Water District 2 - WTP A
KY - Center Ridge - Water District 2 - BGUOC	Control Panel/MCC	Control Panel/MCC - BG - Water District 2 - WTP B
KY - Center Ridge - Water District 2 - BGUOC	Water Storage Tank	Water Storage Tank - BG - CR - Water District 2 - WTP A

KY - Center Ridge - Water District 2 - BGUOC	Water Storage Tank	Water Storage Tank - BG - CR - Water District 2 - WTP B
KY - Center Ridge - Water District 2 - BGUOC	Water Treatment Plant	Water Treatment Plant - BG - Center Ridge - Water District 2 - WTP
KY - Center Ridge - Water District 2 - BGUOC	Well Head	Well Head - BG - CR - Water District 2 - WTP A
KY - Center Ridge - Water District 2 - BGUOC	Well Head	Well Head - BG - CR - Water District 2 - WTP B
KY - Center Ridge - Water District 3 - BGUOC	Chemical Storage Tank	Chemical Storage Tank - BG - Center Ridge
KY - Center Ridge - Water District 3 - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - CR - Water District 3
KY - Center Ridge - Water District 3 - BGUOC	Water Storage Tank	Water Storage Tank - BG - CR - Water District 3
KY - Center Ridge - Water District 3 - BGUOC	Water Treatment Plant	Water Treatment Plant - BG - Center Ridge - Water District 3 - WTP
KY - Center Ridge - Water District 3 - BGUOC	Well Head	Well Head 1 - BG - CR - Water District 3
KY - Center Ridge - Water District 3 - BGUOC	Well Head	Well Head 2 - BG - CR - Water District 3
KY - Center Ridge - Water District 4 - BGUOC	Chemical Storage Tank	Chemical Storage Tank - BG - CR - Water District 4
KY - Center Ridge - Water District 4 - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - CR - Water District 4
KY - Center Ridge - Water District 4 - BGUOC	Pump	Pump 1 - Center Ridge - Water District 4
KY - Center Ridge - Water District 4 - BGUOC	Water Storage Tank	Water Storage Tank - BG - CR - Water District 4
KY - Center Ridge - Water District 4 - BGUOC	Water Treatment Plant	Water Treatment Plant - BG - Center Ridge - Water District 4 - WTP
KY - Center Ridge - Water District 4 - BGUOC	Well Head	Well Head - BG - CR - Water District 4
KY - Darlington Creek	Blower Unit	Blower Unit 1 - Darlington Creek
KY - Darlington Creek	Blower Unit	Blower Unit 2 - Darlington Creek
KY - Darlington Creek	Control Panel/MCC	Control Panel/MCC 1 - Darlington Creek
KY - Darlington Creek	De-Chlorination System	De-Chlor 1 - Darlington Creek
KY - Darlington Creek	Generator	Generator - Darlington Creek
KY - Darlington Creek	Wastewater Treatment Plant	Wastewater Treatment Plant - Darlington Creek
KY - Delaplain - BGUOC	Blower Unit	Blower Unit 1 - Delaplain - WWTP
KY - Delaplain - BGUOC	Blower Unit	Blower Unit 2 - Delaplain - WWTP
KY - Delaplain - BGUOC	Blower Unit	Blower Unit 3 - Delaplain - WWTP
KY - Delaplain - BGUOC	Chlorine Feed System	Chlorine Feed System - Delaplain - WWTP
KY - Delaplain - BGUOC	Control Panel/MCC	Control Panel/MCC 1 - Delaplain - WWTP
KY - Delaplain - BGUOC	Control Panel/MCC	Control Panel/MCC 2 - Delaplain - WWTP
KY - Delaplain - BGUOC	Control Panel/MCC	Control Panel/MCC 3 - Delaplain - WWTP
KY - Delaplain - BGUOC	De-Chlorination System	De-Chlor 1 - Delaplain - WWTP
KY - Delaplain - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - Delaplain - WWTP
KY - Fox Run - BGUOC	Pump	Bleach Pump - BG - FR - WWTP
KY - Fox Run - BGUOC	Blower Unit	Blower 1 - BG - FR - WWTP
KY - Fox Run - BGUOC	Blower Unit	Blower 2 - BG - FR - WWTP
KY - Fox Run - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - FR - WWTP
KY - Fox Run - BGUOC	Control Panel/MCC	Control Panel/MCC - BG - FR - WWTP
KY - Fox Run - BGUOC	De-Chlorination System	De-Chlorination System - BG - FR - WWTP
KY - Fox Run - BGUOC	Lift Stations	Influent Lift Station - BG - FR - WWTP

KY - Fox Run - BGUOC	Lift Stations	Lift Station - KY-FR-LS-1
KY - Fox Run - BGUOC	Lift Stations	Lift Station - KY-FR-LS-2
KY - Fox Run - BGUOC	Lift Stations	Lift Station - KY-FR-LS-3
KY - Fox Run - BGUOC	Pump	NEW PUMP [CHANGE NAME]
KY - Fox Run - BGUOC	Pump	Pump 1 - BG - FR - Influent Lift Station
KY - Fox Run - BGUOC	Pump	Pump 1 - BG - FR - LS 2
KY - Fox Run - BGUOC	Pump	Pump 1 - BG - FR - LS 3
KY - Fox Run - BGUOC	Pump	Pump 2 - BG - FR - Influent Lift Station
KY - Fox Run - BGUOC	Pump	Pump 2 - BG - FR - LS 2
KY - Fox Run - BGUOC	Pump	Pump 2 - BG - FR - LS 3
KY - Fox Run - BGUOC	Sand Filter	Sand Filter - BG - FR - WWTP
KY - Fox Run - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Fox Run - WWTP
KY - Golden Acres - BGUOC	Blower Unit	Blower & Motor - BG - GA - WWTP
KY - Golden Acres - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - GA - WWTP
KY - Golden Acres - BGUOC	Control Panel/MCC	Control Panel/MCC - BG - GA - WWTP
KY - Golden Acres - BGUOC	De-Chlorination System	De-Chlorination System - BG - GA - WWTP
KY - Golden Acres - BGUOC	Flow Meter	Flow Meter - BG - GA - WWTP
KY - Golden Acres - BGUOC	Lift Stations	Lift Station - KY-GA-LS-1
KY - Golden Acres - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Golden Acres - WWTP
KY - Great Oaks - BGUOC	Blower Unit	Blower & Motor 1 - BG - GO - WWTP
KY - Great Oaks - BGUOC	Blower Unit	Blower & Motor 2 - BG - GO - WWTP
KY - Great Oaks - BGUOC	Control Panel/MCC	Control Panel/MCC - BG - GO - WWTP
KY - Great Oaks - BGUOC	De-Chlorination System	De-Chlorination System - BG - GO - WWTP
KY - Great Oaks - BGUOC	Lift Stations	Influent Lift Station - BG - GO - WWTP
KY - Great Oaks - BGUOC	Lift Stations	Lift Station - KY-GO-LS-1
KY - Great Oaks - BGUOC	Pump	Pump 1 - Inf LS - BG - Great Oaks
KY - Great Oaks - BGUOC	Pump	Pump 2 - Inf LS - BG - Great Oaks
KY - Great Oaks - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Great Oaks - WWTP
KY - Herrington Haven - BGUOC	Blower Unit	Blower Unit 1 - Herrington Haven - WWTP
KY - Herrington Haven - BGUOC	Control Panel/MCC	Control Panel/MCC 1 - Herrington Haven - WWTP
KY - Herrington Haven - BGUOC	De-Chlorination System	De-Chlor 1 - Herrington Haven - WWTP
KY - Herrington Haven - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - Herrington Haven - WWTP
KY - JE - Timberland - BGUOC	Blower Unit	Blower Unit 1 - BG - Timberland
KY - JE - Timberland - BGUOC	Blower Unit	Blower Unit 2 - BG - Timberland
KY - JE - Timberland - BGUOC	Control Panel/MCC	Control Panel/MCC 1 - BG - Timberland
KY - JE - Timberland - BGUOC	Control Panel/MCC	Control Panel/MCC 2 - BG - Timberland
KY - JE - Timberland - BGUOC	De-Chlorination System	De-Chlorination System - BG - Timberland
KY - JE - Timberland - BGUOC	Lift Stations	Lift Station - BG - Timberland

KY - JE - Timberland - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Timberland - WWTP
KY - Kingswood - BGUOC	Blower Unit	Blower & Motor 1 - Kingswood
KY - Kingswood - BGUOC	Blower Unit	Blower & Motor 2 - Kingswood
KY - Kingswood - BGUOC	Control Panel/MCC	Control Panel/MCC - Kingswood
KY - Kingswood - BGUOC	Flow Meter	Flow Meter - Kingswood
KY - Kingswood - BGUOC	Lift Stations	Lift Station - KY-KW-LS-1
KY - Kingswood - BGUOC	Pump	Pump 1 - Kingswood
KY - Kingswood - BGUOC	Pump	Pump 2 - Kingswood
KY - Kingswood - BGUOC	Ultra Violet Disinfection	UV Disinfection - Kingswood
KY - Kingswood - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - Kingswood
KY - Lake Columbia - BGUOC	Blower Unit	Blower & Motor - BG - LC - WWTP
KY - Lake Columbia - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - LC - WWTP
KY - Lake Columbia - BGUOC	Control Panel/MCC	Control Panel/MCC - BG - LC - WWTP
KY - Lake Columbia - BGUOC	De-Chlorination System	De-Chlorination System - BG - LC - WWTP
KY - Lake Columbia - BGUOC	Flow Meter	Flow Meter - BG - LC - WWTP
KY - Lake Columbia - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Lake Columbia - WWTP
KY - LH - BGUOC	Blower Unit	Blower & Motor 1 - BG - LH - WWTP
KY - LH - BGUOC	Blower Unit	Blower & Motor 2 - BG - LH - WWTP
KY - LH - BGUOC	Blower Unit	Blower & Motor 3 - BG - LH - WWTP
KY - LH - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - LH - WWTP
KY - LH - BGUOC	Control Panel/MCC	Control Panel/MCC - BG - LH - WWTP
KY - LH - BGUOC	De-Chlorination System	De-Chlorination System - BG - LH - WWTP
KY - LH - BGUOC	Pump	Equalization Pump 1 - BG - LH - WWTP
KY - LH - BGUOC	Pump	Equalization Pump 2 - BG - LH - WWTP
KY - LH - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - LH - WWTP
KY - Marshall Ridge - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Marshall Ridge
KY - Persimmon Ridge - BGUOC	Blower Unit	Blower & Motor - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Pump	Chemical Feed Pump 1 - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Pump	Chemical Feed Pump 2 - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Chlorine Feed System	Chlorine Feed System - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Control Panel/MCC	Control Panel/MCC 1 - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Control Panel/MCC	Control Panel/MCC 2 - Mixers - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	De-Chlorination System	De-Chlorination System - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Lift Stations	Influent Lift Station - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Aerator	Infusion Aerator - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Lift Stations	Lift Station - KY-PR-LS-1
KY - Persimmon Ridge - BGUOC	Lift Stations	Lift Station - KY-PR-LS-2
KY - Persimmon Ridge - BGUOC	Lift Stations	Lift Station - KY-PR-LS-3

KY - Persimmon Ridge - BGUOC	Lift Stations	Lift Station - KY-PR-LS-4
KY - Persimmon Ridge - BGUOC	Lift Stations	Lift Station - KY-PR-LS-5
KY - Persimmon Ridge - BGUOC	Lift Stations	Lift Station - KY-PR-LS-6
KY - Persimmon Ridge - BGUOC	Lift Stations	Lift Station - KY-PR-LS-7
KY - Persimmon Ridge - BGUOC	Lift Stations	Lift Station - KY-PR-LS-8
KY - Persimmon Ridge - BGUOC	Flow Meter	Mag Meter - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Mixer	Mixer 1 - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Mixer	Mixer 2 - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Mixer	Mixer 3 - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Mixer	Mixer 4 - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Mixer	Mixer 5 - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Mixer	Mixer 6 - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Pump	Pump 1 - LS 1 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 1 - LS 2 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 1 - LS 3 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 1 - LS 4 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 1 - LS 5 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 1 - LS 6 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 1 - LS 7 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 1 - LS 8 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 2 - LS 1 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 2 - LS 2 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 2 - LS 3 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 2 - LS 4 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 2 - LS 5 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 2 - LS 6 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 2 - LS 7 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Pump	Pump 2 - LS 8 - BG - Persimmon Ridge
KY - Persimmon Ridge - BGUOC	Telescopic Valve	Telescopic Valve - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Transducer	Transducer - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Flow Meter	Ultrasonic Effluent Flow Meter - BG - PR - WWTP
KY - Persimmon Ridge - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Persimmon Ridge - WWTP
KY - Randview -BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Randview
KY - River Bluff - BGUOC	Blower Unit	Blower Unit 1 - BG - River Bluff
KY - River Bluff - BGUOC	Blower Unit	Blower Unit 2 - BG - River Bluff
KY - River Bluff - BGUOC	Blower Unit	Blower Unit 3 - BG - Riverbluff
KY - River Bluff - BGUOC	Blower Unit	Blower Unit 4 - BG - Riverbluff
KY - River Bluff - BGUOC	Control Panel/MCC	Control Panel/MCC - 1 BG - River Bluff

KY - River Bluff - BGUOC	Control Panel/MCC	Control Panel/MCC - BG - River Bluff LS
KY - River Bluff - BGUOC	Control Panel/MCC	Control Panel/MCC (Hayfield) - BG - River Bluff
KY - River Bluff - BGUOC	Control Panel/MCC	Control Panel/MCC (Rivercreek) - BG - River Bluff
KY - River Bluff - BGUOC	Control Panel/MCC	Control Panel/MCC 2 - BG - River Bluff
KY - River Bluff - BGUOC	Lift Stations	Lift Station - BG - River Bluff WWTP
KY - River Bluff - BGUOC	Lift Stations	Lift Station - KY-RB-LS-1
KY - River Bluff - BGUOC	Lift Stations	Lift Station - KY-RB-LS-2
KY - River Bluff - BGUOC	Lift Stations	Lift Station 1 (Creekview) - BG - River Bluff
KY - River Bluff - BGUOC	Lift Stations	Lift Station 2 (Hayfield) - BG - River Bluff
KY - River Bluff - BGUOC	Pump	NEW PUMP [CHANGE NAME]
KY - River Bluff - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - River Bluff - WWTP
KY - River Bluff - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - BG - Riverbluff 1
KY - Springcrest - BGUOC	Control Panel/MCC	Control Panel/MCC 1 - Springcrest - WWTP
KY - Springcrest - BGUOC	Control Panel/MCC	Control Panel/MCC 2 - Springcrest - WWTP
KY - Springcrest - BGUOC	Pump	Pump 1 - Springcrest - WWTP
KY - Springcrest - BGUOC	Pump	Pump 2 - Springcrest - WWTP
KY - Springcrest - BGUOC	Pump	Pump 3 - Springcrest - WWTP
KY - Springcrest - BGUOC	Pump	Pump 4 - Springcrest - WWTP
KY - Springcrest - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - Springcrest - WWTP
KY - Woodland Acres - BGUOC	Blower Unit	Blower Unit 1 - Woodland Acres - WWTP
KY - Woodland Acres - BGUOC	Blower Unit	Blower Unit 2 - Woodland Acres - WWTP
KY - Woodland Acres - BGUOC	Blower Unit	Blower Unit 3 - Woodland Acres - WWTP
KY - Woodland Acres - BGUOC	Control Panel/MCC	Control Panel/MCC 1 - Woodland Acres - WWTP
KY - Woodland Acres - BGUOC	Control Panel/MCC	Control Panel/MCC 2 - Woodland Acres - WWTP
KY - Woodland Acres - BGUOC	Control Panel/MCC	Control Panel/MCC 3 - Woodland Acres - WWTP
KY - Woodland Acres - BGUOC	Wastewater Treatment Plant	Wastewater Treatment Plant - Woodland Acres - WWTP

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
CASE NO. 2022-00216

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 26: Confirm that the electronic monitoring system will be installed at every facility and that it will monitor all mechanical equipment at each facility (including but not limited to lift stations).

RESPONSE: Confirmed.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
CASE NO. 2022-00216

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 27: Explain how the electronic monitoring system will monitor each type of mechanical equipment (including but not limited to lift stations).

RESPONSE: At the very core of the benefits of the use of RTUs is the ability to monitor the status of the process-critical equipment on a comprehensive and continuous basis. All RTUs have the capability to set custom thresholds and alarms dependent on how the system operates. These alerts and alarms allow for operations to have "eyes" on the facility 24/7/365, so that operational support can be dispatched when issues occur to reduce any potential interruption of service.

For Lift Stations, that entails power status, the status of every pump, and the level of the wet well. Wastewater Treatment (depending on the process) will monitor all of the process critical equipment, including but not limited to: blowers, pumps, gear drives, chemical feed systems, power status, and flow. Water Treatment will monitor all of the process critical equipment, including but not limited to: pumps (booster and well), system pressure, chemical feed systems, power status, flow, and tank levels. All of the core equipment monitoring can be built upon as improvements are made to the facility, furthering our operation team's ability to efficiently operate and serve the community that relies on the mechanical equipment.

Witness: Todd Thomas

REQUEST NO. 28: State specifically whether the proposed electronic monitoring system will be able to monitor the functioning of blower/motor units that provide air to each WWTPs. If it can, explain in detail how the monitoring works.

RESPONSE: The proposed High Tide electronic monitoring system currently monitors blower starts, stops, run time, power, amps, and failure. Therefore, the Company is able to determine in real time if blowers are supplying required air to WWTPs. If a failure occurs, the remote monitoring units send an alarm to operational staff to respond and bring them back into operation before events occur that could lead to additional costs or enforcement actions. If relying only on daily inspections, alternatively, such a failure could occur after the daily inspection and would not be discovered until the next day, when it may be too late to avoid additional costs and/or enforcement actions. Additionally, by monitoring starts, stops, run time, and amps, the Company is able to extend the useful life of the blowers which ultimately helps keeps rates as low as possible.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
CASE NO. 2022-00216

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 29: State whether Bluegrass Water plans to adopt a weekly schedule of performing inspections on Mondays, Wednesdays, and Fridays at each of its WWTPs if its request to modify inspections from daily to three times per week is granted. If not, state the proposed weekly inspection schedule for each WWTP, and explain in detail why that schedule was chosen rather than on Mondays, Wednesdays, and Fridays.

RESPONSE: Bluegrass Water intends to perform inspections three times per week at each site based on a variety of factors, including but not limited to most efficient routes, plant specific process operational needs, and equipment. The three days may not be Monday, Wednesday, and Friday for each plant. However, Bluegrass Water intends to perform inspections on a schedule that would attempt to minimize the amount of time any plant would go without an inspection. For example, Bluegrass Water does not anticipate that a plant would be inspected three consecutive days in a single week, leaving four days before the next daily inspection.

Witness: Todd Thomas

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
CASE NO. 2022-00216

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

VERIFICATION

I, Todd Thomas, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Todd Thomas
Senior Vice President
Bluegrass Water Utility Operating Company, LLC

STATE OF MISSOURI)
) ss:
COUNTY OF ST. LOUIS)

SUBSCRIBED AND SWORN TO before me on this the 29th day of September, 2022.

My commission expires: 5/4/24

DANIEL RYAN JANOWIAK
Notary Public, Notary Seal
State of Missouri
St. Charles County
Commission # 20374795
My Commission Expires 05-04-2024

Notary Public

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE INSTALLATION OF MONITORING EQUIPMENT AND FOR A CORRESPONDING LIMITED WAIVER OF DAILY INSPECTION REQUIREMENTS
CASE NO. 2022-00216

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION

VERIFICATION

I, Brent Theis, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Brent Theis
Vice President and Corporate Controller
Bluegrass Water Utility Operating Company, LLC

STATE OF MISSOURI)
) ss:
COUNTY OF ST. LOUIS)

SUBSCRIBED AND SWORN TO before me on this the 29th day of September, 2022.

My commission expires: 5/4/24

DANIEL RYAN JANOWIAK
Notary Public, Notary Seal
State of Missouri
St. Charles County
Commission # 20374795
My Commission Expires 05-04-2024

Notary Public