

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

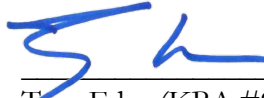
In the Matter of:

ELECTRONIC APPLICATION OF NORTHERN KENTUCKY)
WATER DISTRICT FOR A CERTIFICATE OF PUBLIC) **CASE NO. 2023-00132**
CONVENIENCE AND NECESSITY AND APPROVAL OF)
FINANCING FOR TAYLOR MILL TREATMENT PLANT)
EMERGENCY GENERATOR)

RESPONSE TO COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION

Comes now the Northern Kentucky Water District (“NKWD”) and submits its responses to the Commission Staff’s First Request for Information dated May 18, 2023.

RESPECTFULLY SUBMITTED:



Tom Edge (KBA #95534)
General Counsel
Manager of Legal, Compliance, and Regulatory Affairs
Northern Kentucky Water District
2835 Crescent Springs Rd.
Erlanger, KY 41018
Phone - 859-578-5457
Fax - 859-426-2770
Email: tedge@nkywater.org
Counsel for Northern Kentucky Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on May 26, 2023 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.



Tom Edge, Esq. (KBA #95534)

AFFIDAVIT OF AMY STOFFER


COMMONWEALTH OF KENTUCKY)
)SS
COUNTY OF KENTON)

Comes now affiant, AMY STOFFER, after being first sworn, deposes, and states that she is the Vice President of Engineering, Production and Water Quality for the Northern Kentucky Water District, that she is authorized to submit these Responses on behalf of Northern Kentucky Water District, and that the information contained in the Responses is true and correct to the best of her knowledge and belief, except as to those matters that are based on information provided to her and, as to those, she believes that information to be true and correct.



Amy Stoffer

This instrument was acknowledged, signed and declared by Amy Stoffer to be her act and deed the 25th day of May 2023.



Notary Public, Kentucky at Large
Notary ID Number: KYNP17828
My Commission Expires: 12/20/2024

NORTHERN KENTUCKY WATER DISTRICT

Response to Commission Staff's First Request for Information

CASE NO. 2023-00132

WITNESS – Amy Stoffer

Q.1. Explain whether there were any alternative projects or plans for supplying back-up power to the Taylor Mill Treatment Plant presented to Northern Kentucky District in connection with the Asset Management Plan.

A.1. NKWD states that during the Asset Management Plan development, NKWD staff had originally planned a project to add Granular Activated Carbon (GAC) treatment at its Taylor Mill Plant. This proposed project included 2 - 2,500KW back-up power generators which were sized to power the existing and proposed treatment facilities in addition to 36 MGD of pumping capacity.

NKWD later determined it would postpone implementation of GAC treatment at the Taylor Mill Treatment Plant and as a result reduced its generator need down to 1 – 2,000KW generator. The single generator currently proposed is sized to run the existing treatment facilities in addition to 20 MGD of pumping capacity. Average daily pumping capacity at this location during a maximum month condition is 18 MGD. If NKWD decides to add GAC treatment at the Taylor Mill Treatment Plant at some point in the future or pumping needs increase, a second generator will be recommended. Otherwise, no other viable alternatives were or are available.

NORTHERN KENTUCKY WATER DISTRICT

Response to Commission Staff's First Request for Information

CASE NO. 2023-00132

WITNESS – Amy Stoffer

Q.2. Have any alternative projects or plans for supplying back-up power to the Taylor Mill Treatment Plant been considered by Northern Kentucky District at the time of, or since the Asset Management Plan. If no alternative projects or plans have been considered, explain why.

A.2. Please see NKWD's Response to Item 1.

NORTHERN KENTUCKY WATER DISTRICT

Response to Commission Staff's First Request for Information

CASE NO. 2023-00132

WITNESS – Amy Stoffer

Q.3. For any alternatives to the proposed plan identified in your responses to Items 1 and 2 above, provide:

- a. Construction cost estimates;**
- b. Estimated water treatment plant savings;**
- c. Estimated Operational & Maintenance costs;**
- d. Any differences in useful lives of equipment from the proposed project.**
- e. Any documents referencing these alternatives.**

A.3. NKWD states that it would cost an estimated \$1,370,000 based on the engineer's estimate for the second generator. NKWD would expect that its operational and maintenance costs would increase \$23,500 per year for the additional generator. No savings or differences in useful lives of the equipment would be obtained by having the second generator at this time.