

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY-)
AMERICAN WATER COMPANY FOR A)
CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY) CASE NO. 2023-00248
AUTHORIZING THE CONSTRUCTION OF)
A WATER TRANSMISSION MAIN TO THE)
CITY OF MILLERSBURG)

**CITY OF PARIS’S FIRST REQUEST FOR INFORMATION
TO KENTUCKY-AMERICAN WATER COMPANY**

In accordance with the Public Service Commission’s (“Commission”) July 21, 2023 Order, the City of Paris (“Paris”) propounds the following data requests upon the Applicant Kentucky-American Water Company (“KAWC”). KAWC shall respond to these requests in accordance with the provisions of the Commission’s Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate Paris’s request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for Paris.

4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

7. If KAWC objects to any request on any grounds, please notify counsel for Paris as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

10. These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted

herein.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "M. Todd Osterloh".

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Requests for Information

1. Please refer to Application paragraph 9, in which it states: “KAW does not anticipate that the Project will compete with any other utilities.” Confirm that the proposed main beginning at a tie-in to KAW’s existing 12-inch main located along US-68 approximately 4.3 miles northeast of the Fayette/Bourbon County border to the tie-into KAW’s Millersburg system at a 6-inch main near the existing connection to Paris’s system will only be used transmission, and that section of transmission main will not be used to serve retail customers.
2. Please refer to Application paragraph 9, in which it states: “KAW’s design consultant for the project has started developing more detailed construction plans sheets, and KAW can provide those to the Commission as they are completed.” Please provide a status update as to the development of more detailed construction plans, including when KAW anticipates submitting more detailed plans to the Commission.
3. State whether KAW has determined where along US-68 it proposes to install the transmission main.
4. State whether KAW has considered the location of other existing and planned utilities in proposing the location of the transmission main.
5. Please refer to Application paragraph 13. Provide a detailed explanation of how KAW calculated the “variable incremental production cost of approximately \$0.60 per 1,000 gallons for KAW to supply the same volume of water.”
6. Please refer to the testimony of John Magner, starting at line 23 on page 6, where it states: “Constructing a 16” main around Paris will increase available capacity for potential water sales to Paris Water Works.” Please confirm that construction of KAW’s proposed transmission line would enable Paris to make an emergency interconnection with the proposed transmission line.
7. Please refer to Table 1 on page 5 of 8 of Exhibit 2 to the Application (Stantec Memo regarding Millersburg Water Supply Project– Preliminary Planning Study).
 - a. Provide a detailed explanation of how KAW or Stantec determined Future Demand for “Stream No. 7” (KAW to Paris) would be 117 MG annually and 444 peak gpm.
 - b. Confirm that “Steam No. 7” refers to anticipated sales by KAW to Paris.
8. Explain why it would be beneficial to install a 16-inch main that ties-in to KAW’s existing 12-inch main located along US-68 approximately 4.3 miles northeast of the

Fayette/Bourbon County border, as opposed to maintaining the current size of the planned connecting main of 12 inches.

9. State the anticipated cost differential between installing 33,000 linear feet of 16” ductile iron water main as proposed by KAWC compared to 33,000 linear feet of 12” ductile iron water main in the same proposed location.
10. Please refer to the testimony of John Magner in response to the question starting at line 4 on page 7. Please provide all reports, analysis, and documentation evaluating the various alternatives KAW considered for supplying water to KAW’s Millersburg system.
11. Please refer to the testimony of John Magner, starting at line 12 on page 7. Identify the total estimated cost for constructing a main through downtown Paris.
12. Please refer to the testimony of John Magner, starting at line 17 on page 7.
 - a. Explain why tying into KAW’s existing 8” main on Bethlehem Road would not provide adequate hydraulic capacity.
 - b. Explain why tying into KAW’s existing 8” main on Bethlehem Road would adversely affect pressures in other areas of KAW’s system.
 - c. Explain whether design changes could be made to that alternative route such that it could provide adequate hydraulic capacity without adversely affecting pressures in other areas of KAW’s system.
13. State what real property or private easements will need to be obtained for KAW’s proposed route of the transmission main.
14. Please refer to the testimony of John Magner, starting at line 6 on page 4, which states “KAW’s current available capacity may not be able to meet these demands and KAW has had to so inform prospective customers.” Quantify the current demand that KAW believes is unmet.
15. Identify the monthly gallons of water KAW purchased from Paris from January 2021 to present.
16. Identify the monthly total gallons of water sold by KAW to KAW’s customers downstream of Paris’s master meter from January 2021 to present. Please breakdown the monthly totals by KAW’s retail customers and each of KAW’s wholesale customers served through the Millersburg system.
17. Describe KAW’s leak detection efforts on its Millersburg system to help minimize unnecessary consumption.