

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF CHRISTIAN)
COUNTY WATER DISTRICT FOR THE ISSUANCE)
OF A CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY TO CONSTRUCT A WATER) Case No. 2023-00341
SYSTEM IMPROVEMENTS PROJECT PURSUANT)
TO THE PROVISIONS OF KRS 278.020 AND)
807 KAR 5:001)**

Response to Commission Staff's First Request for Information

The Christian County Water District ("Christian District"), by Counsel, hereby files its Response to the Commission Staff's First Request for Information, dated November 16, 2023, as follows:

WITNESS to all Commission Requests: James Owen, General Manager, Christian District.

REQUEST 1: Refer to Christian District's Application, Exhibit A (Project Description and Necessity).

(a) Describe how Christian District determined where to install water lines and describe how the decision to construct each water line was made. Use the number labels on Exhibit A-9 (Map).

RESPONSE 1(a): Christian District maintains a list of unserved areas in its service territory. The Cleaner Water funds are designated to be used to provide water service to unserved areas. Each of the water lines to be constructed, as shown on Exhibit A-9, were determined to be areas that would be most beneficial to potential customers. Christian District's Board examined the unserved areas, including topological features and barriers, hydraulic studies and cost of construction, to decide which areas would be the most beneficial use of the grant funds to provide water service to customers. Please refer to the numbered Map and the corresponding Preliminary Project Budget (Exhibit A-6) which includes the numbered roads which make up the Phase 9A project.

(b) Provide any documentation supporting Christian District's assessment of which areas were unserved or underserved, including but not limited to population growth studies.

RESPONSE 1(b): Attached hereto as **Exhibit A** are (1) a list of the unserved areas in Christian District's service area, including house counts; and (2) a list of the roads for each of the three phases of the Phase 9 project (depending on the availability of funds).

(c) Provide copies of all engineering reports pertaining to the proposed project.

RESPONSE 1(c): The engineering studies supporting the proposed project include the map of unserved areas (Exhibit A-9) and the Hydraulic Analysis performed in association with the plan submission to the Kentucky Division of Water. The Hydraulic Analysis is being electronically filed in connection with this Response.

(d) State whether "Phase 9" of construction is part of a larger plan to add or replace infrastructure and describe any such plan.

REQUEST 1(d): Phase 9A is part of the larger plan labeled Phase 9. Phase 9 is an attempt to reach (1) unserved areas of Christian District's service area and (2) underserved areas of Christian District's service area. Phase 9 was chosen for funding by the Clean Water Funding initiative to improve the lives of Kentuckians. Like most rural water districts, Christian District maintains a list of unserved areas and has plans to provide service to such areas as funding becomes available. The availability of grant funds for such extensions lessens the need to justify the project as cost effective and allows service to be extended to potential customers who may have otherwise waited indefinitely for such service. The proposed project provides service to those areas as determined by Christian District's Board of Commissioners as being the highest priority. Additional roads and areas exist and will likely come into existence in the future and will be provided service as opportunities to do so become available.

(e) Identify any proposed water lines for which alternate designs or routes were considered as well as the estimated construction costs of those alternatives and any difference in operations and maintenance costs.

RESPONSE 1(e): The proposed water lines were designed by Christian District's Engineers after direction from Christian District's Board as to which unserved areas needed to be served. The Engineers look at topological features and barriers, hydraulic studies and cost of construction to lay out the best design and route for the water lines to achieve Christian District's goals.

(f) Explain how Christian District determined what size pipe would be used for the proposed project.

RESPONSE 1(f): Christian District, through their Engineers, performed a hydraulic analysis of each proposed water line. The analysis takes into account the projected demand, the terrain, the anticipated growth in the area, the potential for further development and the need to maintain good water quality. All of this information is used to determine the size of the pipe.

(g) State whether Christian District plans to claim depreciation for the proposed infrastructure. If so, state the useful lives of the proposed infrastructure.

RESPONSE 1(g): Christian District will claim depreciation of the proposed water lines and uses the straight line method of depreciation for all of its assets. The newly installed water lines will be depreciated over a 50 year useful life.

REQUEST 2: Refer to Christian District's Application, Exhibit A-9 (map).

(a) Describe what the "Alternate Phase IX Water Line" markings on the Map constitute.

RESPONSE 2(a): Alternate Phase IX Water Line marking on the Map are water lines that are not expected to be installed in the proposed project but may be included if funds are available.

(b) State whether "Alternate Phase IX Water Line" markings are also proposed future water lines.

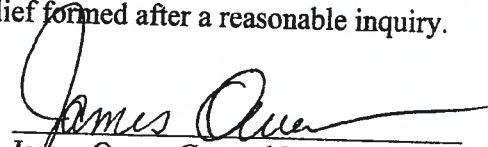
RESPONSE 2(b): Yes, the Alternate Phase IX Water Line markings are proposed future water lines which will hopefully be installed depending on the availability of funds.

REQUEST 3: Refers to Christian District's Application, page 3, paragraph 5(vi). State how Christian District plans to fund any cost overruns.

RESPONSE 3: In the event of a cost overrun, Christian District plans to either (i) reduce the scope of the proposed project to match the available funds; (ii) seek additional funding; or (iii) use available Christian District funds, or a combination of some or all of these options.

Certification of Responses to Commission Staff's First Request for Information

I hereby certify that I have supervised the preparation of the Responses to the Commission Staff's First Request for Information. This information provided in the Responses is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


A handwritten signature in black ink, appearing to read "James Owen", written over a horizontal line.

James Owen, General Manager
Christian County Water District

The undersigned has prepared this Response as Counsel to and on behalf of the Christian County Water District, a governmental agency, and hereby certifies that this Response is true and accurate to the best of the undersign's knowledge, information and belief formed after a reasonable inquiry.

Respectfully Submitted:

Rubin & Hays

By 
W. Randall Jones, Esq., Counsel for the
Christian County Water District
Kentucky Home Trust Building
450 South Third Street
Louisville, Kentucky 40202
Telephone: (502) 569-7534
Fax: (502) 569-7555
Email: wrjones@rubinhays.com

CERTIFICATE OF SERVICE

The undersigned, in accordance with 807 KAR 5:001, Section 8, hereby certifies that Christian County Water District's foregoing Response is a true and accurate copy that was electronic transmitted to the Kentucky Public Service Commission on November 21, 2023; that there are currently no parties that the Kentucky Public Service Commission has excused from participation by electronic means in this proceeding.



W. Randall Jones, Esq.
Rubin & Hays
Kentucky Home Trust Building
450 South Third Street
Louisville, Kentucky 40202
Phone: (502) 569-7534
Fax: (502) 569-7555
Counsel for Christian County Water District
Email: wrjones@rubinhays.com

EXHIBIT A

List of Unserved Areas

List of Roads for Phase 9 Project

Christian County Water District
Unserved Area's

| Roads | Homes | School |
|-------------------------------|-------|--------------------------|
| Fentress Lane | 2 | 1 |
| Rogers | 1 | |
| Hayes | 5 | |
| Firetower | 5 | |
| Simmons Lane | 2 | |
| Champion Hwy | 2 | |
| Carneal Lane | 8 | |
| Root Road | 3 | |
| Frey Road | 1 | older house? Burned? |
| Rogers Cemetery | 1 | Jewell Parish |
| St Elmo (Hwy 1453) | 5 | 2 lived in 3 older |
| Askew Farm Rd. I-24 Rest Area | 2 | |
| Pine Tree | 3 | ? |
| Flower Rd | 3 | cabin, trailers, at end? |
| Eli Road | 3 | |
| Owen West | 2 | |
| Pruitt | 2 | |

| | | |
|---------------------|---|---------|
| Pleasant Green Hill | 1 | Ferrell |
| J Knight Ext. | 5 | |
| Crow Rd | 2 | |
| Rogers | 1 | |
| Caledonia Pee Dee | 1 | |
| Thomas Sparkman | 2 | |
| Buffalo Rd | | |
| Robinson Lane | | |
| George Shaw | | |
| Dr. Hatcher & Ext | | |
| A J Draper | | |
| Dudley Boyd | | |
| Cox Mill | | |

Private Roads or Lanes

| | | |
|---------------------------------|----|--|
| Long Lane | 12 | |
| Off Anderson | 5 | |
| Off Hwy 115 | 7 | |
| Dulin/Meacham (PR1014 & PR1016) | 6 | |
| Charles Hurt Road | 4 | |
| Hoover ? | | |

PHASE 9

First Phase We install ourselves

- 5. Fentress Lane 1 Easement Needed ?
- 8. Carneal Lane Easements Needed
- 1. Cerulean Springs Rd. 1 Easement Needed
- 2. Root Road All Collected ?
- 6. Pruitt Lane Easements needed
- 3. Pleasant Green Hill Rd. All Easements collected?
- 4. Owen West Rd. All Collected ?
- 7. A Daniel Rd. All Collected
- 10. Long Lane Not Contacted Yet
- 11. Hoover Lane (Hoover Produce Washing Station Rd.) Interested (4 homes)

Second Phase We consider Contracting out

- 12. J Knight Rd. (Possible Condemnation)
- 13. Hayes (Rough Some sections) Easements Sent out
- 14. Hwy 68 to Fairview
- 15. Meacham-Dulin (Rough Some Sections) Not Contacted Yet
- 16. Hwy 68 (4 lane) toward Fairview (4" Some locations) (additions to Phase 5A) opposite side of the road, connecting some cross casing together.

17. Hwy 68 (4 Lane) From Gracey @ Hwy 1026 to the Trigg county line and connect to pump station Hwy 68.
18. Green Hill Subdivision (Connection under Madisonville Rd.- Bore)
19. Champion Rd. (?) (**Extremely Rough**) Water Close By Both Existing Homes
20. FireTower (Rd.) (?) **Pressure Concerns, Elevation**
21. Old Madisonville Rd @ Grapevine Rd connection & Going under RR
if feasible to increase pressure on Grapevine Road.
22. Old Madisonville Rd. after Talley Lane connecting under RR
23. T Sparkman Two houses
24. Rehab Greenville Rd. Pump stations (May just replace pumps?)
25. Rehab Antioch Rd Pump station (May just replace pumps?)
26. Rehab Dawson Rd. Pump Station (?) (Cost)
27. Rehab Madisonville Rd Pump Station (?) (Cost)

Third Phase

28. Eli Road
29. Grapevine Rd. to Atkinson School
30. Pine Tree Road
31. Rogers Road To one house
32. Additional interconnection & Private multi-family roads to spur development.