

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

ELECTRONIC APPLICATION OF ROWAN	)	CASE NO.
WATER, INC. FOR APPROVAL OF WATER	)	2024-00103
TRAINING	)	

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**RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR  
INFORMATION TO ROWAN WATER, INC. DATED MAY 9, 2024**

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**Filed: May 21, 2024**

**VERIFICATION**

STATE OF KENTUCKY )  
 ) SS:  
COUNTY OF ROWAN )

Jerry Patrick, General Manager of Rowan Water, Inc., being duly sworn, states that he has supervised the preparation of certain responses to Commission Staff's First Request for Information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

**ROWAN WATER, INC.**

By: 

Jerry Patrick, General Manager

Subscribed and sworn to before me by Jerry Patrick, General Manager of Rowan Water, Inc., on this 20 day of May, 2024.

  
NOTARY PUBLIC

9-5-24 Ky NP 14003  
My Commission Expires:

**ROWAN WATER, INC.**

**PSC CASE NO. 2024-00103**

**RESPONSE TO REQUEST FOR INFORMATION**

**PSC'S REQUEST FOR INFORMATION DATED 05/09/24**

**REQUEST 1**

**RESPONSIBLE PARTY: Jerry Patrick**

**Request 1.** State whether the training listed on the agenda as Capital Planning with Engineer Consultant will use the handout materials titled Distribution Design and Optimization. If not provide a copy of any written materials that will be provided to each attendee.

**Response 1.** Yes, the training on the agenda as Capital Planning with Engineer Consultant is the material marked by the slide titled Distribution Design and Optimization and followed by an outline of the presentation to be given by Bluegrass Engineering. The name of the presentation and power point slides including outlined topics are attached to this response and have been revised to match. The pdf page 10, Amended Application, should be replaced for Agenda Day 2. It has been revised and is attached. The pdf pages 102-103, Amended Application should be replaced by the attached slides for the presentation.

# Rowan Water Summer Training II

*Presented by Rowan Water, Inc. and Honaker Law Office, PLLC*

*1765 Christy Creek, Morehead, Kentucky 40351*

**August 21, 2024**

**Day 2 (7hours)**

**8:00-9:00am**

**Management Resources (1hour)**

*Leadership & Management Skills for Compliance*

*Shannon Elam, Morgan County Water District General Manager*

**9:00-10:00am**

**Planning Resources (1 hour)**

*Water Management Council, Planning Services, Project*

*Administration Services, and GIS/Mapping Services*

*Jocelyn Gross, Director of Planning, Gateway ADD*

**10:00-11:00am**

**Capital Improvement Planning: Engineer Consultants (1 hr)**

*Matthew R. Curtis, P.E, Bluegrass Engineering*

**11-12:00pm**

**Roundtable with Utility Partners (1 hour):**

*Moderator: Brittany Hayes Koenig-Regulatory Compliance related to Common Management Issues/Discussion of Solutions-Shared Management/Equipment;*

*Best Practices in Customer Communication, Succession Planning*

*Bath County Water District, Morehead Utility*

*Plant Board, Judy Water Association, West Liberty*

*Water Company, Olive Hill Utilities, Morgan County Water*

*District, Fleming County Water Association, Rowan Water*

**12:00-12:30pm**

**Lunch**

**12:30-1:30pm**

**Managing for 811 Compliance (1 hour)**

*Jamie Gaddis, Kentucky 811*

**2:30-3:30pm**

**Damage Prevention (1 hour)**

*Jessica Canfield-Norris, Ky PSC, Division of Inspections*

**3:30-4:30pm**

**Capital Planning Resources (1 hour)**

*Don Schier, Kentucky Infrastructure Authority*

*WRIS Portal, State Revolving Fund, Clean Water Act Grants*

# ROWAN WATER SUMMER TRAINING

HONAKER LAW OFFICE, PLLC  
BRITTANY HAYES KOENIG

▶ August 21, 2024

# CAPITAL IMPROVEMENT PLANNING

PRACTICAL DISCUSSION OF ENGINEERING CONSULTANTS & COMMUNICATION  
BEST PRACTICES AND CONSIDERATIONS FOR DIRECTORS AND MANAGERS FOR  
ASSET ASSESSMENT, RATES, FUNDING, CONCEPT TO CONSTRUCTION..

## Existing Conditions of Assets

Age,  
condition,  
inefficiencies  
of the system



EXISTING RATE  
SCHEDULE  
Revenues  
Expenses

NEEDED IMPROVEMENTS

- \* Failing Infrastructure
- \* Improved Efficiencies
- \* Projected Project Costs
- \* Budgetary Improvements

“  
CONCEPT TO  
CONSTRUCTION  
”

Proper Planning  
Sourcing Funding  
Easements  
Value Time-  
Money

**ROWAN WATER, INC.**

**PSC CASE NO. 2024-00103**

**RESPONSE TO REQUEST FOR INFORMATION**

**PSC'S REQUEST FOR INFORMATION DATED 05/09/24**

**REQUEST 2**

**RESPONSIBLE PARTY: Jerry Patrick**

**Request 2.** State whether the trainings listed on the agenda as Managing for 811 Compliance and Call Before You Dig will both use the handout materials titled Underground Facility Damage and Prevention. If not, provide a copy of any written materials that will be provided to each attendee.

**Response 2.** “Managing for 811 Compliance” and “Call Before You Dig” are two separate presentations. On August 21, 2024, “Managing for 811 Compliance” scheduled for 1 hour at 12:30pm-1:30pm, will be presented by Jamie Gaddis, Kentucky 811. The presentation slides for the Kentucky 811 presentation are at pages 105-108 in the pdf, Amended Application. “Call Before You Dig” is a presentation by the Kentucky Public Service Commission, Division of Inspections, Staff Attorney III, Jessica Canfield-Norris, scheduled for 1 hour from 1:30pm-2:30pm, and for clarification the title of the presentation should be changed to “Damage Prevention.” A revised Agenda for Day 2 has been attached to Response 1, and a Bio for Ms. Canfield-Norris, and the presentation slides attached here for the Kentucky Public Service Commission to replace the pdf page 109 in the pdf, Amended Application.

## BIO

Jessica Norris Canfield – Jessica graduated with a bachelor’s degree from Marshall University in 2010. She then attended Salmon P. Chase College of Law at Northern Kentucky University where she received her law degree in 2014. Prior to joining the Office of General Counsel at the Public Service Commission, Jessica worked as a trial attorney for the Kentucky Department of Public Advocacy and then as Legal Counsel for the Administrative Office of the Courts. Jessica has been a Staff Attorney at the Public Service Commission since 2021. The focus of her practice with the PSC is enforcement of the Underground Facilities Damage Prevention Act.

Thank you,

**Jessica D. Norris Canfield, Esq.**  
Staff Attorney III  
Office of General Counsel  
KY Public Service Commission

Phone: 502-782-8508

Email: [jnorriscanfield@ky.gov](mailto:jnorriscanfield@ky.gov)

Web: <https://psc.ky.gov>

211 Sower Blvd, Frankfort, KY 40601



SAFETY IS IN YOUR HANDS.  
EVERY DIG. EVERY TIME.



# Kentucky Underground Facilities Damage Prevention Act

PSC Damage Prevention



TEAM  
KENTUCKY

Any views expressed in this presentation are those of the presenter and do not reflect official positions of the PSC

## KY Underground Facilities Damage Prevention Act

- The views expressed in this presentation are those of the Commission's Division of Inspections (DOI). This presentation is intended to convey DOI's interpretation of the **Underground Facilities Damage Prevention Act** of 1994 as amended and explain DOI's investigation process.
- *The views expressed in this presentation do not reflect the official position of the Kentucky Public Service Commission.*

2

## The Act:

- Underground Facility Damage Prevention Act of 1994
  - Effective January 1, 1995
- KRS 367.4901 through 367.4917
- Amended in 2018 to give PSC enforcement authority
  - Establishes enforcement mechanisms
  - Most recently amended in 2021
- Establishes one-call (811) center
- Sets requirements for excavators and operators

3

## Public Service Commission Jurisdiction

- Under KRS 367.4917(6) the Kentucky Public Service Commission has:
  - statewide authority to enforce the Act; and
  - seek civil penalties for any violation of the Act that results in damage to an underground facility used to transport gas or hazardous liquid.
- The Commission's Division of Inspections (DOI) investigates all incidents of damage to underground **natural gas** facilities.
  - Operators of natural gas facilities are required by KRS 367.4909(4) to report incidents of damage to their facilities to the Commission within 30 days of the damage.
  - DOI investigates to determine if any provision of the Act was violated, not necessarily to determine "fault" for the damage.

4

## Overview of the Kentucky Electric Generation and Transmission Siting Board

- Both lines and associated facilities: vaults, manholes, tanks, etc. for:
  - **Electricity**
  - **Natural gas/Hazardous liquids/ Oil**
  - **Telecommunications/ Cable television**
  - **Water – including steam**
  - **Sewage**
  - **Temporary survey markings**
  - **Reclaimed water, slurry, irrigation**
  - **Excavation boundaries: White**
    - \*Location color codes (paint or flagging)

5

## Key Definitions:

- **Damage:** Doesn't have to be a puncture. Includes any weakening of structural or lateral support or penetration of protective coating or housing. "It's just a scratch" may still be damage.
- **Demolition:** any operation by which a structure or mass of material is wrecked, razed, moved, or removed by means of mechanized equipment, or discharge of explosives.
- **Excavator:** Any entity or individual, other than those exempted by KRS 367.4915, engaged in excavation, demolition, or timber harvesting using mechanized equipment.
- **Operator:** Anyone owning or operating underground facilities.

6

## Key Definitions Continued:

- **Excavation:** Any activity that results in the movement, placement, probing, boring, or removal of earth, rock, or other material in or on the ground by the use of any tools or equipment, by the discharge of explosives, or by the harvesting of timber using mechanized equipment.
- **Emergency:** An event that poses likelihood of loss of life or property, danger to health or environment, interrupts utility service or blocks transportation facilities.
- **Kentucky Contact Center:** Kentucky 811
- **Protection notification center:** Operator-provided call center for operators who do not belong to 811.

7

## Key Definitions Continued:

- **Nonintrusive excavating:** Hand tools; air or water digging.
- **Mechanized equipment:** Anything with a motor.
- **Approximate location: 24 inches** either side of metallic facilities or those with tracer wire.
  - "Tolerance zone" at least four (4) feet wide but not wider than the combined width of the underground facility plus two feet (24 inches) measured from the outer edge of each side of the underground facility;
  - For unmapped/untonable facilities, the underground facility shall be located as accurately as possible from field location records **AND** shall require notification from the operator of the inability to accurately locate the facility.

8

## Key Definitions Continued:

- **Working Day:** every day, except Saturday, Sunday, and holidays, as commencing at 12:01 a.m. eastern time and ending at 12:00 midnight eastern time **EXCLUDING the day the locate request was made;**
- **Positive response:** means an automated or written communication system provided by each protection notification center for all locate requests the center receives that allows excavators, locators, operators, and other interested parties to determine the status of locating an underground facility and requires response and verification by operators and excavators.

9

## Key Definitions Continued:

- **Second notice** means a notice that is made by an excavator to a notification center when an operator has failed to comply with the positive response requirements;
- **Untonable facility** means an underground facility that cannot be located from the surface using locating methods which meet industry standards and that requires additional efforts and extended time;
- **Work site contact** means an individual that will be present at the excavation site when the excavation will occur.

10

## KRS 367.4911(10) Hard Surface:

- Addition of hard surface language;
- allows mechanized equipment in the tolerance zone **for the limited purpose** to remove pavement or other manmade hard surface, or indigenous rock:
  - if used during the initial penetration only to the depth necessary; **AND**
  - if an individual other than the equipment operator visually monitors the activity.

11

## KRS 367.4911 (10)

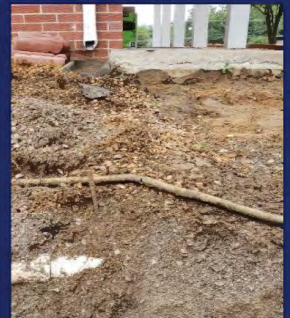
- Must have a locate ticket for the excavation;
  - Plan the excavation to avoid damage to the underground facility;
  - **Must have a spotter to visually monitor the excavation;**
  - Mechanized equipment is used only to the depth necessary to remove the pavement;
  - If the underground facility contains NG/hazardous liquids lines , the excavator **shall** notify the facility owner of the excavator's intent prior to removing indigenous rock;
  - Materials within 12 inches of the outer edge of the visually identified or visually confirmed facility may be removed;
- Does not prohibit the placement or removal of shores from existing excavation.*

12

## INVESTIGATIONS



## INVESTIGATIONS



## Water Districts Duties under the Act

### 1. KRS 367.4911 provides the duties of Excavators.

- A water district is an excavator when it installs or repairs its own underground facilities, and when it engages in digging or probing to investigate the source of a water leak. When a water district engages in excavation, all of the provisions of KRS 367.4911 apply to water districts.

### 2. KRS 367.4909 provides the duties of Operators.

- A water district is an operator as defined by the Act because a water district operates underground facilities to serve the public. A water district transports its product to the public by use of underground facilities. All of the provisions of KRS 367.4909 apply to water districts, except those designated as applicable only to operators of gas or hazardous liquid facilities, such as the requirement to report damage to the Commission.

15

## Excavator requirements (KRS 367.4911):

- Make locate request 2 full working days before scheduled start, but not more than 10 full working days before.
- Addition of a procedure for operators and excavators to agree upon an excavation start date and allow the operators to respond to the locate request any time prior to the agreed upon start date.
- On the PSC Website, Damage Prevention has uploaded a written agreement form for operators and an excavators to use for these agreements. The form documents the agreed upon date by which the locate requests must be completed for each utility.
- Website: <http://psc.ky.gov/WebNet/GasExcavationDamage>

16

## Excavator requirements (KRS 367.4911):

- If facilities are marked before 2 days have elapsed, excavation may begin **only if** the excavator has been notified that all marking is complete or that there are no facilities in the area.
- Dig tickets are valid for **21 calendar** days, beginning the day requested.
- Excavator is responsible for maintaining markings until work is completed.

*This DOES NOT mean refreshing the marks on your own.*

17

## Excavator requirements (KRS 367.4911):

- If work is not completed within 21 days, **request remarking on day 19.**
- **Re-marking** must be requested if markings are no longer visible.
- Excavator shall provide on-site employees with location information provided by each operator **AND locate ticket** number assigned by protection center.
- If, after 2-day period for marking has expired, excavator finds evidence of unmarked facilities, protection center must be notified immediately.
- If given a second notice, the **operator has 1 working day to locate** the facilities.
- **THIS APPLIES TO WATER DISTRICTS.**

18

## Excavator requirements (KRS 367.4911):

- Provide the protection center with:
  - name and address of **excavator**;
  - **location** of the site or sites;
  - **type** and extent of excavation;
  - contact **number for person responsible** for the work to be performed.
- **Requires the name and phone number for a work site contact.**
- If more than one excavator at a site, **each excavator must notify the protection center and request a locate ticket.**
- If the excavator has **NOT** called the protection center, *on-site employees are responsible for calling in.*

19

## Excavator requirements (KRS 367.4911):

- **If requested by operator**, or if the proposed excavation location cannot be accurately identified, the excavator must mark the location being excavated using **white paint** or flagging.
- If an excavator finds evidence of an **unmarked underground facility** the **operator** shall have **6 business hours** (from 8 a.m. to 6 p.m., in the time zone where the excavation is occurring) to identify the facility.
- **THIS APPLIES TO WATER DISTRICTS.**

20

## Excavator requirements (KRS 367.4911):

- When excavating within the approximate location of an underground facility (*24 inches either side of metallic facilities or those with tracer wire; otherwise*) **an excavator MUST use hand digging or other non-intrusive means in order to avoid damage.**

21

## Excavator requirements (KRS 367.4911):

- If an excavator damages an underground facility, the excavator must:
  1. **STOP** all work immediately.
  2. If there is an escape, **or suspected escape**, of any flammable, toxic or corrosive gas or liquid, (you SMELL gas) **call 911 immediately.**
  3. **Notify the operator – ONLY THE OPERATOR CAN PERFORM REPAIRS!**  
**NEVER ATTEMPT TO REPAIR A GAS LINE THAT HAS BEEN DAMAGED!**

22

## Exemptions (KRS 367.4915):

- Excavation by operator in own easement, if no other operator's facilities cross easement.
- Routine road or railroad repairs (defined)
- Agricultural soil tilling.
- Non-mechanized excavation on private property, outside of any operator's easement or right-of-way.
- Grave opening in a cemetery.
- Landfill operations at permitted site.
- Coal mining at regulated location.
- Leak migration testing using metal hand probes.
- Nonintrusive excavation by operator or contractor in order to provide location in response to excavator request.
- **Emergency work by utility operator or utility contractor.**

23

## Emergency Exemption:

- Authorized persons responding to emergency situations are exempted from KRS 367.4905 through 367.4917. **However,** they must take "every reasonable precaution to protect the public safety and underground facilities of others."

24

## Operator responsibilities (KRS 367.4909):

- Respond to non-emergency locate requests within 2 working days.
  - **The operator has a total of five (5) working days to locate an untonable or unmapped facility.**
- Respond to emergency locate requests within 48 hours – this includes weekends, holidays.
  - *Penalty for calling in false emergency locate requests.*
- Respond to large projects requests within 5 working days of request or project start date, whichever is later. *(in excess of 5,000 linear feet).*
  - **The operator has a total of eight (8) working days to locate an untonable or unmapped facility.**
- Respond to design information requests within 10 days.

25

## Operator responsibilities (KRS 367.4909):

After a locate request is received, the operator must:

- Inform the excavator of the location of facilities that may be damaged or pose a safety concern.
- Inform the excavator of any other information that would assist in locating or avoiding contact with the facilities.
- **If no permanent markings are present, provide temporary markings to locate the facility.** *See final Order Case No. 2019-00280*
- Notify the excavator if no facilities are present.
- Notify the excavator if unable to comply within the required time due to weather or other extraordinary conditions.

26

## Operator responsibilities (KRS 367.4909)(11):

- **All new facilities must include means to accurately identify and locate the facility from the surface ( e.g., tracer wire).**
- *Does not apply to repairs of existing facilities.*

27

## Penalties/enforcement - general (KRS 367.4917):

- Excavators - \$250- first offense; \$1,000 – second offense within a year; \$3,000 – third and subsequent offense.
- Operators - \$250- first offense; \$1,000 – second offense within a year; \$3,000 – third and subsequent offense.
- **New Reset:** Specifies that a violation shall be considered a first violation if more than 365 days have elapsed since the last incident attributable to the person in violation.
- **If there's a release of natural gas an additional \$1,000 is added to the penalty amount.**
- Protection center - \$1,000 per offense.

28

## Penalties/enforcement - general (KRS 367.4917):

- False request for emergency locate - \$1,000 per offense.
- Any law enforcement agency may assess penalties. Funds remain with jurisdiction that collects them.

29

## Water Districts as Operators - Penalties

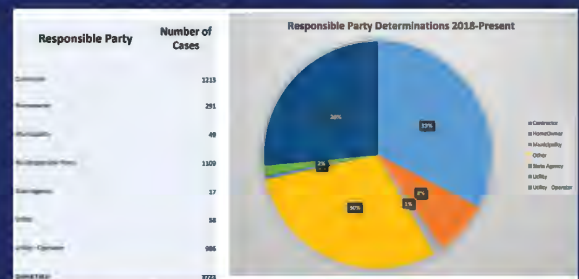
- Penalties under KRS 367.4917 do not apply to water districts in their role as *operators* but will apply in their role as **Excavators**.
- **HOWEVER:**
  - **KRS 278.040** grants the Commission jurisdiction over the service utilities provide to the public.
  - **KRS 278.250** grants the Commission authority to investigate the condition of a utility subject to its jurisdiction
  - The penalties set forth in **KRS 278.990** are applicable to the conduct of Water Districts as operators of underground facilities (**\$2,500 individual and \$10,000 utility**).

30

## INVESTIGATIONS

31

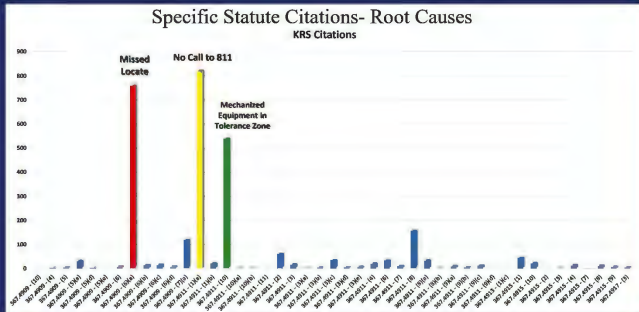
## INVESTIGATIONS



32



## INVESTIGATIONS



## INVESTIGATIONS

- Was a Damage Report completed?
- Damage Reports should include:
  - Written Reports from staff at the site of damage when it occurred.
    - Photographs
    - Diagrams / Drawings
  - Written agreements. No Verbal agreements.
  - Any other evidence relevant to the damage.

34

## INVESTIGATIONS

IS THERE A DIG TICKET?

35

## INVESTIGATIONS

- Was a timely request made?
  - When was the request made and when did the damage occur?
- Did excavation begin in the absence of location marks?
  - This is where pre-excavation pictures can help.
  - Are there other facility marks (water, sewer, etc.)
    - Is there a gas meter on the house?

36

## INVESTIGATIONS

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- Were the facilities properly and accurately located?
  - Again pre-excavation pictures help.
- Did the damage occur w/in 24 inches of the locate mark?
  - Post-damage pictures help. Try to show locate marks and damage location.

37

## INVESTIGATIONS

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- Were the appropriate excavation methods used in close proximity to the pipeline that was damaged?
  - Use of non-mechanized equipment w/in 24 inches of the locate marks.

38

## INVESTIGATIONS

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- Do any of the statutory exemptions apply?



39

## INVESTIGATIONS

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What do these photos tell us?



## INVESTIGATIONS

Is this damage within the tolerance zone?



## INVESTIGATIONS



## INVESTIGATIONS



## INVESTIGATIONS



## INVESTIGATIONS

Connect the dots



65

## INVESTIGATIONS

The statute does not specify depth.

It was stated that the line was only 2 inches deep.



66

## INVESTIGATIONS

Did a shovel / posthole digger cause this damage?

Non-mechanized equipment?



67

## INVESTIGATIONS

Where did this damage occur.

Photos should show address and landmarks.



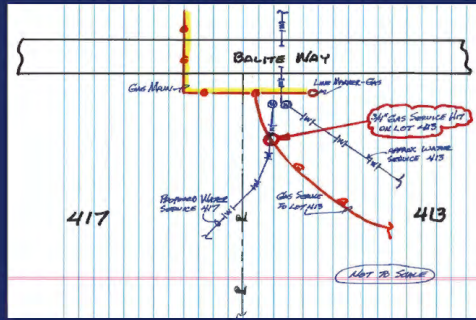
68

## INVESTIGATIONS



49

## INVESTIGATIONS



Diagrams enhance your photographs and report.

50

## INVESTIGATIONS



LOCATE FRONT OF ADDRESSES 1600, 1602, 1604, 1606, AND 1608 ORMSBY LANE STARTING AT THE ROADSIDE MARKING 20 FEET INTO THE PROPERTY

51

## INVESTIGATIONS



LOCATE EAST SIDE OF ADDRESSES 7827 AND 7828 FAIRMEADOWS LANE

52

## INVESTIGATIONS



LOCATE EAST SIDE OF ADDRESSES 7828 AND 7827 FAIRMEADOWS LANE

53

## INVESTIGATIONS



LOCATE EAST SIDE OF ADDRESSES 7828 AND 7827 FAIRMEADOWS LANE

54

## INVESTIGATIONS



## INVESTIGATIONS



## INVESTIGATIONS



57

## INVESTIGATIONS

### Demolition of Structures

- Typically the damage is to above-ground lines/valves/meters
- Examples:
  - Service was supposed to be turned off, demolition hits line to meter above ground
  - Furnace in basement still connected to service line, service not turned off

58

## INVESTIGATIONS

### Some helpful hints for excavators:

- Don't assume all pipes or lines are straight.
- Don't assume facility depths are uniform.
- Don't remark or improve markings on your own.
- Don't assume everything has been marked just because some things have.
- Don't assume permanent pipeline markers are exactly above the pipe.

59

[psc.ky.gov](http://psc.ky.gov)

Eric V. Tout  
Consumer Complaint Investigator  
Kentucky Public Service Commission  
Office: 502.782.2622  
[EricV.Tout@ky.gov](mailto:EricV.Tout@ky.gov)

Jessica Norris Canfield  
Staff Attorney  
Kentucky Public Service Commission  
Office: 502.782.8508  
[jnorriscanfield@ky.gov](mailto:jnorriscanfield@ky.gov)

Ashley Rhodes  
Consumer Complaints Investigator II  
Kentucky Public Service Commission  
Office: 502.782.2578  
[AshleyB.Rhodes@ky.gov](mailto:AshleyB.Rhodes@ky.gov)

60

**ROWAN WATER, INC.**  
**PSC CASE NO. 2024-00103**  
**RESPONSE TO REQUEST FOR INFORMATION**

**PSC'S REQUEST FOR INFORMATION DATED 05/09/24**

**REQUEST 3**

**RESPONSIBLE PARTY: Jerry Patrick**

**Request 3.** State whether paragraph 9, subpart a, of the Amended Application provides a description for both the trainings listed on the agenda as Managing for 811 Compliance and Call Before Your Dig.

**Response 3.** The Amended Application at paragraph 9, subpart a, is the paragraph describing the "Round Table Discussions with Managers from Area Utilities." That presentation is addressed in Request/Response 4. Subpart i, discusses the two presentations described below. One, dealing with the practical tickets for service and the other, explaining the law and compliance requirements. "Managing for 811 Compliance" is to be presented by Jamie Gaddis of the organization, Kentucky 811. The presentation slides for the Kentucky 811 presentation are at pdf pages 105-108 in the Amended Application. "Call Before You Dig" is a separate presentation by the Kentucky Public Service Commission, Division of Inspections, Staff Attorney III, Jessica Canfield-Norris, and for clarification the title of the presentation will be changed to "Damage Prevention." The "Call Before You Dig/Damage Prevention" is a presentation on the Underground Facilities Damages Act. The slides provided at pdf page 109 in the Amended Application contains the Underground Facilities Damages Act, however it should be replaced by the attachment for Response to Request 2, containing the slides for the PSC presentation.



**ROWAN WATER, INC.**

**PSC CASE NO. 2024-00103**

**RESPONSE TO REQUEST FOR INFORMATION**

**PSC'S REQUEST FOR INFORMATION DATED 05/09/24**

**REQUEST 4**

**RESPONSIBLE PARTY: Jerry Patrick**

**Request 4.** Explain how the two Round Table Discussions with Managers from Area Utilities will enhance the participating water district commissioner's understanding of his or her responsibilities and duties.

**Response 4.** “Round Table Discussions with Managers from Area Utilities” has been planned for one hour each day of the summer training program and structured with a moderator prepared to discuss the regulatory compliance related to discussed issues. Day 1’s discussion topics are regulatory compliance related to common management issues and discussion of solutions regarding: 1) shared management techniques; 2) discussing the possibility of sharing or leasing equipment together for neighboring utilities; 3) best practices in customer communication; and 4) succession planning. Day 2’s topics for discussion are planned to be regulatory compliance related to common management issues and discussion of solutions related to 1) workforce development because the utilities face similar circumstances related to retaining and training their staff, 2) sharing resources with regard to compliance for certification training, and 3) opportunities for purchasing in bulk. The above listed topics, as described in the Amended Application have been developed in response to the Commission’s recent comments in water utility hearings and Staff information requests that inquire whether water utilities have made efforts to communicate

to neighboring utilities to share requests for proposals for contractors, equipment or bulk purchases. Additionally, the Commission has echoed federal grant requirements to encourage discussing regionalization. Each topic will be introduced in the context of the regulations implicated by the topic and examples of how the topics have come up in cases or examples of utilities that have shared resources or managers or have applied similar efficiencies. The benefit to the Directors and Commissioners in attendance is that managers usually provide a specific perspective directly complying with state and federal regulations and issues that affect their ability to accomplish those compliance goals that are important for Directors and Commissioners to understand. The moderator will present the discussion topics listed above, with reference to the state and federal regulations. She will also present issues arising from recent cases and comments from the Commission and open the discussion to the managers and leaders from the neighboring utilities to discuss compliance with the Commission's Orders, state and federal regulations for the Commission and Division of Water. The moderator will have examples of methods used and encourage comment regarding different options, methods, tips and even recommendations of what has worked and what has not worked with managers from the neighboring utilities provides helpful information to the water utility Directors and Commissioners on resolution of common issues unique to the community of utilities. The format of a discussion also helps builds critical relationships that aid in resolving issues that may arise in the management of the utilities for the leaders of the neighboring utilities as well. The Directors and Commissions will have the opportunity to participate in the

discussion and ask questions and the managers can discuss the practical compliance activities at the utilities that is important for all of the participants to understand. This will serve as a forum for all leaders of the water utilities to discuss important topics that affect each of the water utilities, provide insight as to ways the Directors, Commissioners and managers can all work together to improve the water utilities in Kentucky.