

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

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF THE )**  
**WESTERN MASON COUNTY WATER DISTRICT )**  
**FOR THE ISSUANCE OF A CERTIFICATE )**  
**OF PUBLIC CONVENIENCE AND NECESSITY )**  
**TO CONSTRUCT A WATER SYSTEM )**  
**IMPROVEMENTS PROJECT AND AN ORDER ) Case No. 2024 - 00107**  
**AUTHORIZING THE ISSUANCE OF SECURITIES )**  
**PURSUANT TO THE PROVISIONS OF )**  
**KRS 278.020, KRS 278.300 AND 807 KAR 5:001 )**

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**RESPONSE TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION**

The Applicant, Western Mason County Water District ("Western Mason District"), by Counsel, files this Response to the May 24, 2024 Commission Staff's Second Request for Information set forth below.

**Request No. 1.** State the expected useful life of the meters being replaced by the 825 new meters, and identify the meters being replaced by brand, model, and year of installation.

**Witness:** David French, General Manager, Western Mason County Water District.

**Response No. 1.** The remaining useful life of the meters being replaced is zero (see attached **Exhibit 1** (Plant and Depreciation Schedule that was filed as part of the ARF application in Case No. 2023-00182)). The meters being replaced are Badger meters, the Orion model. See Exhibit 1 for the years of installation.

**Request No. 2.** State when the meters being replaced were last tested.

**Witness:** David French, General Manager, Western Mason County Water District.

**Response No. 2.** The Badger meters were tested prior to their installation and have not been tested since. The Badger meters have been problematic from the start and the company has not provided any service help to the Western Mason District staff. Approximately 5 to 10 meters are failing every month and have to be read manually. Testing the rest of the meters would not be beneficial due to the fact that the failure rate is so high and the batteries are reaching the end of their lives.

**Request No. 3.** Explain in detail how Western Mason District determined that the Master Meter Allegro is the reasonable least cost alternative.

**Witness:** David French, General Manager, Western Mason County Water District.

**Response No. 3.** Western Mason District staff has had many extensive wiring, service and software issues with the Badger meters and the meter company has not provided any assistance. Such issues caused the staff and engineers to do a detailed, time consuming search for a more reliable, cost effective meter brand. Staff consulted with many surrounding utilities and asked about any issues the utilities were having with their meters. After much investigation, it was decided that the Master Meter Allegro met the needs of Western Mason District.

**Request No. 4.** Provide any cost comparisons that were completed with any other meters considered including either capital costs, operation, and maintenance costs, or both.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 4.** Both Badger and Master Meters have similar purchasing costs, in addition to other manufacturers offering similar radio read capabilities. In the past three years, Badger has

not been able to supply Western Mason District with meters needed to complete a previous project so the decision was made to change brands to Master Meter. The maintenance costs on the new Master Meters should be significantly lower as compared to the many costly maintenance issues Western Mason District experienced with the Badger meters.

**Request No. 5.** Provide the projected operation and maintenance savings from the installation of the 825 new meters and explain how the operation and maintenance savings were calculated.

**Witness:** David French, General Manager, Western Mason County Water District.

**Response No. 5.** Western Mason District has two employees that are responsible for the distribution system and the amount of time saved by these employees in not having to take care of wiring repairs and transponder repairs that are destroyed by mowers and cattle in rural system will significantly reduce our maintenance costs while also providing our employees with more time to focus on other needs of the system. An actual dollar figure of the decrease in operation and maintenance costs cannot be calculated until the new meters are installed and in operation.

**Request No. 6.** State whether Western Mason District considered upgrading the two underground pump stations in lieu of installing a new pump station, and if so, explain Western Mason District's reasoning for electing to install the new pump station, including any cost justifications or operational concerns that led Western Mason District to choose to install new pump stations over upgrading the existing pump stations.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 6.** The existing pump station being replaced is over 25 years old and based upon the previously submitted hydraulic analysis looking at current and future potable water

demands of Western Mason District, the cost of replacing all components of the existing pump station, including pumps, motors, drives, piping, electrical, etc., was considered cost prohibitive. Additionally, the existing underground pump station is considered "permit required confined space" by OSHA, whereas the above ground station is not. While the underground station has reached the end of its useful life, upgrading only the internal components without addressing the steel enclosure, access ladder, and welded steel piping, the potential hazardous conditions that could occur should a water leak happen and failure of the sump pump is higher than desired by Western Mason District. These potential risks are greatly reduced with an above ground structure. Western Mason District did not wish to continue with the underground station and the above ground station was in the best interest and safety of the personnel. The existing pump station has been upgraded twice since its installation and there is minimal room for any further upgrades.

**Request No. 7.** If cost justifications lead Western Mason District to choose to install a new pump station over upgrading the two underground pump stations:

(a) Explain how Western Mason District determined that installing the new pump stations was the least cost alternative.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 7(a).** The cost to replace pumps, motors, drives, piping, electrical, etc., in the existing pump station that is over 25 years old is cost prohibitive. Also, maintaining water service to customers during a pump station rehabilitation is a time consuming, difficult task.

(b) Provide the expected capital costs for upgrading the two underground pump stations.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 7(b).** Western Mason District and its engineers did not calculate the capital costs of rehabilitating both existing pump stations. Based on the hydraulics of the system, one underground booster pump station is still meeting the current and future demands of the system. One underground booster pump station was only looked at being replaced based upon the hydraulic demands of the system. The existing equipment in the booster pump station to be replaced is over 25 years old and to replace all of the equipment within the station and potentially piping in and near the pump station would create capital costs close to the cost of a new pump station. In addition, as previously stated, to rehabilitate the existing booster pump station while continuing to meet the demands of the system would create an additional expense.

(c) Identify any expected differences in operation and maintenance expense between installing a new pump station as compared to upgrading the two underground pump stations.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 7(c).** The new booster pump station will create efficiencies in pumping capacity and volume to meet the current and future demands of the system. In addition, the new pump station is scalable in that should future demands continue to increase, Western Mason District can add stages to the existing equipment at minimal costs in order to increase pumping capacity. The existing equipment does not provide for this scalability without an extensive capital investment to the entire booster pump station. The new pump station will enable Western Mason District to move water more efficiently throughout the distribution system. This efficiency will be realized through reduced run times on the existing pumps and motors, thus increasing the useful life of same. The reduced run times will also reduce the electrical costs currently experienced by Western Mason District.

**Request No. 8.** State whether the above ground pump station replaces either or both of the existing pump stations.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 8.** The above ground pump station will replace only the existing underground pump station located near the existing Minerva standpipe. The existing underground pump station located near the Dover standpipe is currently meeting the system demands and does not warrant the necessary capital investment for replacement at this time.

**Request No. 9.** Refer to Western Mason District's response to Commission Staff's First Request for Information, Item 7. State the expected remaining useful life of the two existing pump stations.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 9.** See attached **Exhibit 1**. The two existing booster pump stations were put in service on December 31, 1993 and July 1, 1997 with expected useful lives of 20 years. Both pump stations have significantly exceeded their useful lives. From an operational perspective, one pump station is still meeting the demands of the system.

**Request No. 10.** State the expected useful life of the above ground pump station.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 10.** The new above ground pump station will be assigned a 20 year useful life from an accounting perspective. From an operational perspective, it is expected that the new pump station will operate for a period in excess of 20 years.

**Request No. 11.** If Western Mason District did not consider any alternatives, state how Western Mason District determined that installing a new above ground pump station was the reasonable least cost alternative for assuring adequate service to its customers.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 11.** Western Mason District did consider rehabilitating the existing pump station but as discussed in Responses 7(b), 7(c) and 9, it was considered a more financial, economic and operational decision to replace the station with a more efficient, cost effective new station that will meet current and future customer demands.

**Request No. 12.** Identify any projected operation and maintenance savings from the installation of the new above ground pump station and explain how the operation and maintenance savings were calculated.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 12.** It is estimated that the new booster pump station will create a savings of approximately \$5,000 per year. These savings will be realized with a reduction in electrical and maintenance costs. The new station will utilize variable frequency drives which operate in a more efficient manner than the existing pump station. Western Mason District has been operating the existing station at a cost of approximately \$500 per month and the existing pumps are running on average of 20.3 hours per day. With the efficiency of the new pumps and drives, it is expected that pump run times will be reduced by up to 8 hours per day and the corresponding reduction in electrical costs could be around \$200 per month.

**Request No. 13.** State if Western Mason District, including its third party engineers, considered any alternative equipment for the pump station, such as a different make and model of

pump, and state the difference in capital cost and operation and maintenance cost between the alternatives and equipment selected.

**Witness:** Paul Reynolds, Bluegrass Engineering, PLLC

**Response No. 13.** Western Mason District's engineers reviewed the hydraulic data to determine the optimal pumping capacity for the new booster pump station taking into account current and future potable water demands. From this analysis, it was determined that a 250 GPM pump at 150' total dynamic head and 15 horsepower would meet the necessary conditions of the hydraulic model (see page 15 of the Project Specifications (Minerva Booster Pump Station - Plan) filed in this Case as "WSI\_bid\_set\_04-01-2024". These requirements are further outlined in the previously filed document "COMPLETE\_SPECS\_-\_CONTRACT\_1", DIVISION 01-GENERAL REQUIREMENTS, SECTION 01220-UNIT MEASUREMENTS AND PAYMENTS, SECTION 012500-PRODUCTS AND SUBSTITUTIONS, DIVISION 15-MECHANICAL, DIVISION 17-TELEMETRY, DIVISION 26-ELECTRICAL. The engineers do not specify "Means and Methods" to accomplish the desired results of the proposed project, as the contractors bidding on the project had the freedom to bid any pumps and related materials that would meet the identified specifications of the pump station. All contractors bidding on the project chose to bid an above ground booster pump station supplied by Engineered Fluid, Inc.

**Request No. 14.** Provide any documentation or communications regarding the Cleaner Water Grant Funds.

**Witness:** David French, General Manager, Western Mason County Water District.

**Response No. 14.** The Cleaner Water Grant Fund documentation is being filed with this Response. 14.



**Request No. 15.** State whether the Cleaner Water Grant Funds are required to be used for any specific purpose, such as only for water line replacement, new meter purchase and installation, or installation of the above ground pump house, i.e., if a CPCN for one or more of those projects was denied would it affect Western Mason District's ability to receive the grant.

**Witness:** David French, General Manager, Western Mason County Water District.

**Response No. 15.** The Cleaner Water Grant Funds are allocated to a specific WX or SX identified project within the Kentucky Infrastructure Authority (KIA) Project Portal. As long as the Cleaner Water Grant Funds are utilized for the components as identified in the project profile for that particular WX or SX project, then it has been approved through KIA. Western Mason District has already been utilizing funding through the Cleaner Water Grant program but does have some remaining funds that could potentially be used related to this project. The project profile the funds have been approved for identify replacement of existing pumping equipment. It is the desire of Western Mason District to continue to try and create as much economic savings to its customer base as possible by potentially using some of the Cleaner Water Grant Funds for this project. If the Commission denies a CPCN for any portion of this project, it would inhibit Western Mason District's ability to use those remaining funds towards additional savings on this project.

**Request No. 16.** State whether the loan from the Rural Water Financing Agency could be issued for a lesser amount if the Commission only approved the application in part.

**Witness:** Kristen Millard, Director, Raymond James & Associates, Inc.

**Response No. 16.** The final principal amount of the loan from the Rural Water Financing Agency to Western Mason District can be adjusted prior to the time the Financial Advisor to the Rural Water Financing Agency (Raymond James & Associates, Inc.) begins the process of selling

bonds to fund the loan to Western Mason District. Once the bonds are sold to a purchaser, the principal amount cannot be adjusted.

**Request No. 17.** Explain why the terms of the loan from the Rural Water Financing Agency need to be approved by the Commission prior to a loan offer being made.

**Witness:** Kristen Millard, Director, Raymond James & Associates, Inc.

**Response No. 17.** The Rural Water Financing Agency cannot include the loan to Western Mason District in its pending pooled financing bond issue prior to receiving loan authorization from the Commission. If the Western Mason District loan was included in the pending bond issue and the Commission subsequently denied authorization to Western Mason District to make the loan, then the Rural Water Financing Agency bonds would have been issued in an amount greater than necessary to fund the loans being made from such bond proceeds thus creating excess bond proceeds.

**Request No. 18.** Explain whether the interest rate on the Rural Water Financing Agency loan will be fixed or variable once the loan is issued.

**Witness:** Kristen Millard, Director, Raymond James & Associates, Inc.

**Response No. 18.** The interest rates on the Rural Water Financing Agency loan to Western Mason District will be variable according to the various principal maturity dates as shown on **Exhibit "C"** to the original Application which are estimated. These interest rates will be finalized once the Rural Water Financing Agency bonds are sold and the interest rates on such bonds are known. In the current financial market, variable rate loans are more financially feasible than fixed rate loans.

**Request No. 19.** Describe the loan process with the Rural Water Financing Agency loan, including the process and anticipated time frames associated with the Rural Water Financing Agency issuing bonds, Western Mason District's loan agreement and receipt of loan funds.

**Witness:** Kristen Millard, Director, Raymond James & Associates, Inc.

**Response No. 19.** Attached hereto as **Exhibit 19** is a proposed Schedule of Events prepared by Raymond James & Associates, Inc., as Financial Advisor to the Rural Water Financing Agency. As shown on the Schedule, bond offering documents will be distributed on or about June 11, 2024, with a bond sale occurring on June 25, 2024. Western Mason District's loan agreement (assistance agreement) will be executed the last week of June and a final bond closing is scheduled to occur on July 10, 2024, with the loan proceeds being available to the borrowers (including Western Mason District) on July 10, 2024.

**Request No. 20.** State how much time Western Mason District will have between receiving a loan offer from Rural Water Financing Agency and having to accept the terms without the offer expiring.

**Witness:** Kristen Millard, Director, Raymond James & Associates, Inc.

**Response No. 20.** The offering documents on the Rural Water Financing Agency bonds will be distributed on or about June 11, 2024. These documents will include information on all borrowers (including Western Mason District) and will be used to market the bonds. If Western Mason District chooses not to be a participant in this bond issue or if the Commission denies the Application to issue securities, then this should be determined prior to June 11, 2024. Otherwise, Raymond James & Associates, Inc., will have to reschedule the bond sale which will delay the remaining borrowers from receiving their loan funds.

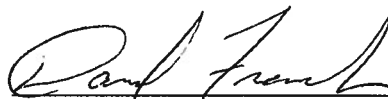
**Request No. 21.** State the source of the \$76,002 that Western Mason District stated is available for contribution to the project.

**Witness:** David French, General Manager, Western Mason County Water District.

**Response No. 21.** With the rate increase approved by the Commission in Case No. 2023-00182, Western Mason District has been able to allocate a portion of its increased revenue to accounts that involve replacement of existing infrastructure. It is anticipated that should Western Mason District need to contribute this amount of funds to the project, it would have the financial capability to do so. However, as the project progresses, it is also anticipated that there may be opportunities for project cost savings that would reduce or potentially eliminate the need for a contribution from Western Mason District.

**Verification of Response to Commission Staff's Second Request for Information**

The undersigned, David French, states that he is the General Manager of the Western Mason County Water District and that he has personal knowledge of the matters set forth in the Responses for which he is identified as the witness, and the answers contained in said Responses are true and accurate to the best of his knowledge, information, and belief formed after a reasonable inquiry.

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

David French, General Manager  
Western Mason County Water District

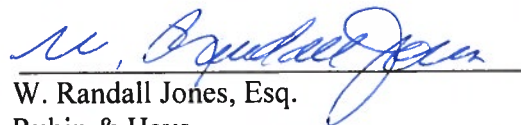
Respectfully Submitted,  
Rubin & Hays

By 

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**CERTIFICATE OF SERVICE**

The undersigned, in accordance with 807 KAR 5:001, Section 8, hereby certifies that the Western Mason County Water District's electronic filing of the foregoing Response is a true and accurate copy of the same document being electronically transmitted to the Kentucky Public Service Commission on May 31, 2024; that there are currently no parties that the Kentucky Public Service Commission has excused from participation by electronic means in this proceeding.



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# **EXHIBIT 1**

## **Plant and Depreciation Schedule**







# **EXHIBIT 19**

## Proposed Schedule of Events

**RURAL WATER FINANCING AGENCY  
FLEXIBLE TERM FINANCE PROGRAM  
PUBLIC PROJECTS REVENUE BONDS, SERIES 2024 C**

**Schedule of Events**

May 2024						
S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

June 2024						
S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

July 2024						
S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

<u>DATE</u>	<u>EVENT</u>
<b>April 23, 2024</b>	<ul style="list-style-type: none"> <li>• PSC application submitted for Western Mason Water District</li> </ul>
<b>By May 20</b>	<ul style="list-style-type: none"> <li>• Submission of Applications to RWFA</li> </ul>
<b>May 23</b>	<ul style="list-style-type: none"> <li>• Rating package submitted</li> <li>• Term Sheet and appendices provided to Rubin &amp; Hays</li> </ul>
<b>May 28</b>	<ul style="list-style-type: none"> <li>• First draft of Preliminary Official Statement and Legal documents sent to distribution list for review and comment</li> </ul>
<b>June 11</b>	<ul style="list-style-type: none"> <li>• Posting of documents</li> <li>• Anticipated release of bond rating</li> </ul>
<b>June 25</b>	<ul style="list-style-type: none"> <li>• Bond Sale at 11:00 am (ET)</li> <li>• Final debt service schedules sent out</li> </ul>
<b>June 26-July 2</b>	<ul style="list-style-type: none"> <li>• Closing documents sent to RWFA for final execution</li> <li>• Loan assistance agreements sent to borrower for final execution</li> </ul>
<b>July 10</b>	<ul style="list-style-type: none"> <li>• Closing of bond issue and distribution of proceeds</li> </ul>