# PSC CASE NO. 2024-00325

## RESPONSE TO REQUEST FOR INFORMATION

PSC'S REQUEST FOR INFORMATION DATED JULY 18<sup>™</sup> 2025

# REQUEST 1- REFER TO THE WATER SUPPLY AGREEMENT (AGREEMENT) BETWEEN HENRY DISTRICT #2 AND SUNANZA, INC. (SUNANZA)

A) Provide a copy of Exhibits A, B, and C to the Agreement

Exhibit A: General Location of Property

Responsible Party (Cliff Ashburner of Dinsmore & Stohl LLP)

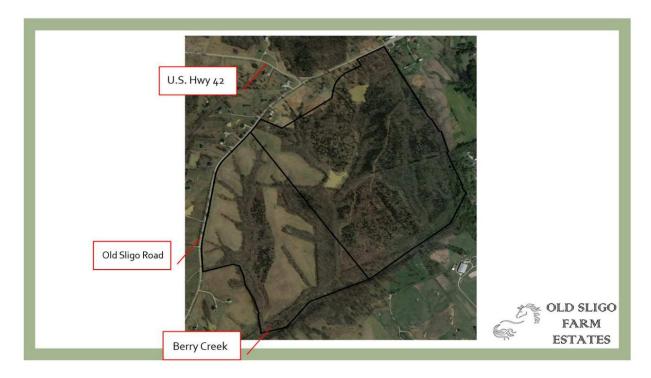
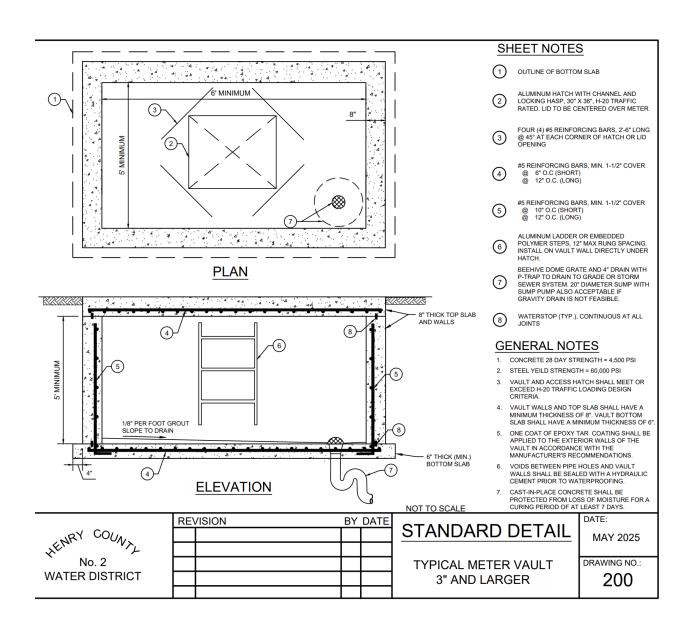
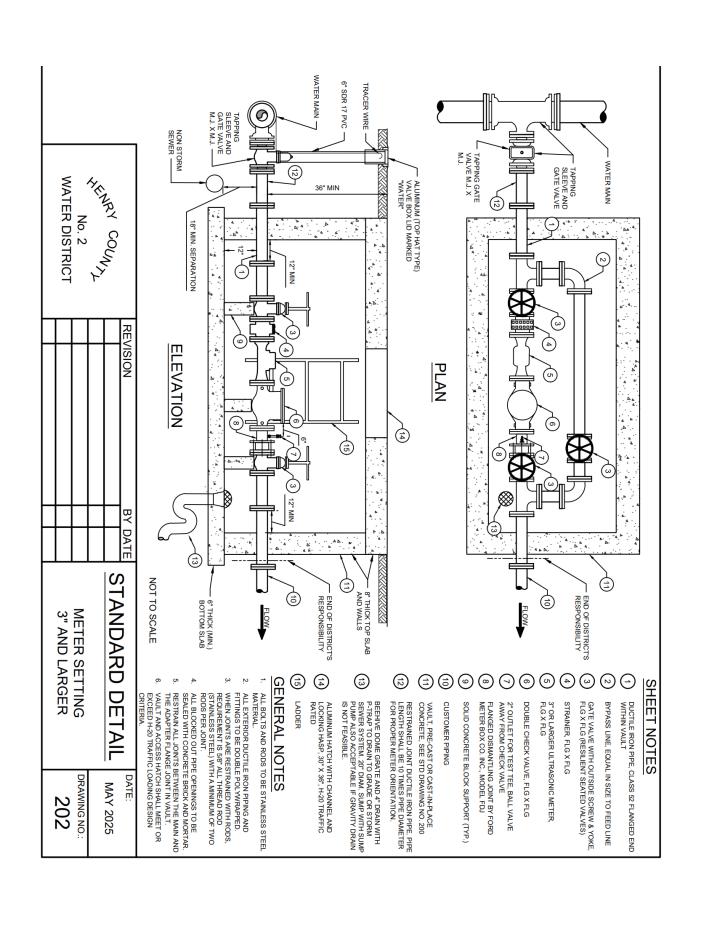


Exhibit B: Specs

Responsible Party (Lucy Pacholik of Tetra Tech Engineering)





#### Exhibit C: Language included in Declaration

Responsible Party (Cliff Ashburner of Dinsmore & Stohl LLP)

#### Exhibit C

#### **HOA Maintenance Obligations**

Fire Protection. Declarant, at Declarant's sole initial cost, has provided for the construction and installation of fire hydrants throughout the Oldham County, Kentucky portion of the Property, along with the construction and installation of a dedicated six (6) inch water line and separate meter(s) and back-flow meter(s) to exclusively serve the fire hydrants (collectively the "Fire Protection Infrastructure"), to provide the appropriate fire protection infrastructure for the entire Subdivision (including both the Oldham and Henry County, Kentucky portions). Declarant or, upon termination of Class B membership pursuant to the Section herein this Declaration entitled "Class of Membership," the Board of Directors of the Sub-Association, shall be responsible for the costs associated with the provision of water and the maintenance, repair, and replacement of the Fire Protection Infrastructure to ensure continued functionality. The Declarant or, upon termination of Class B membership pursuant to the Section herein this Declaration entitled "Class of Membership," the Board of Directors of the Sub-Association shall also cause the Fire Protection Infrastructure to be annually inspected and obtain an annual certification from a qualified professional to verify that all Fire Protection Infrastructure is in proper working order. Documentation of this certification shall be maintained by the Declarant or, upon termination of Class B membership pursuant to the Section herein this Declaration entitled "Class of Membership," the Board of Directors of the Sub-Association. All Fire Protection Infrastructure shall comply with applicable law, and Declarant understands and agrees that Henry County Water District #2 and its successors and assigns is only responsible for the supply of water, and that all fire protection for the Oldham County, Kentucky section of the Property shall be the responsibility of the appropriate agency having jurisdiction.

# 1 b) EXPLAIN HOW THE DEDICATED LINE FOR THE PRIVATE FIRE SYSTEMS MEETS THE DEFINITION OF PRIVATE FIRE SERVICE LINE CONTAINED IN 807 KAR 5:095, SECTION 1 (2)

Responsible Party (Cliff Ashburner of Dinsmore & Stohl LLP)

## 1 c) PROVIDE A COPY OF THE HYDRAULIC ANALYSIS PERFORMED BY TETRA TECH INC DATED JLUY 15, 2022

Responsible Party (Lucy Paholick of Tetra Tech Inc)



July 15, 2022

Mr. Keith Morris Chief Operating Officer Henry County Water District No. 2 8955 Main Street Campbellsburg, KY 40011

Dear Mr. Morris,

Tetra Tech has completed our hydraulic analysis of the L'Esprit Parkway/Old Sligo Rd area and presents the findings below. The analysis utilized information provided by Henry County Water District No. 2 (the District) and used the existing KYPipe model of the District's distribution system to evaluate the ability to serve a proposed 76-lot subdivision, Old Sligo Farm Estates, which straddles the Henry Co./Oldham Co. border.

#### **Performance Criteria**

The District follows state regulations established by the Kentucky Division of Water (KDOW) which require the District to provide residential pressures between 35 and 150 psi. During flushing, the District must provide velocities of 2.5 fps while ensuring pressures throughout the system do not drop below 20 psi. However, it should be noted that per the District's tariff as approved by the Kentucky Public Service Commission (PSC), the District does not guarantee fire protection. Per a decision by the Henry County Water District Board of Commissioners during their meeting on July 12, 2022, fire hydrants will not be permitted in the proposed development.

#### **Evaluation of System Performance**

The L'Esprit Pkwy/Old Sligo Rd area is located in northwest Henry Co. near the Oldham Co. border in La Grange. Potable drinking water in this area is provided by the 1M gallon Hwy 42 Tank. Pressure regulating valves (PRVs) are utilized in the area to control residential pressures below the required maximum pressure of 150 psi. The water mains along L'Esprit Pkwy and Old Sligo Rd are 8 inch PVC; there is a 3 inch main along Hwy 42 which can be valved off from the Old Sligo Rd line if desired. Both PRVs are on the 8 inch mains; one is located on L'Esprit Pkwy near Pendleton Rd (PRV 1), and is set to 60 psi, and the other is located on Old Sligo Rd near Hwy 42 and the 3 inch main (PRV 2) and is set to 50 psi. The map below shows the location and sizes of the water mains and PRVs in the area. The location of the proposed Old Sligo Farm Estates development is shown in yellow.

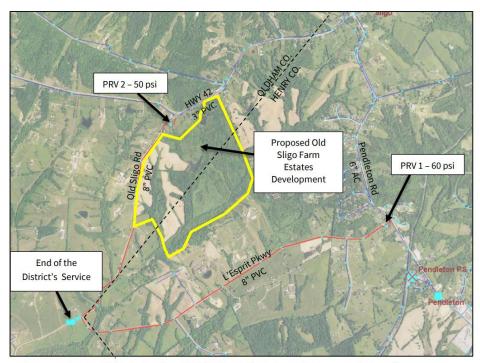


Figure 1. Map of L'Esprit Pkwy/Old Sligo Rd Area and Proposed Development.

#### **Hydraulic Modeling**

The KYPipe hydraulic model of the District's system was used to determine if the distribution system has the capacity to provide adequate pressure and flow to the proposed development. A residential demand node at elevation 840 ft AMSL (above mean sea level) was added off the 8 inch main on Old Sligo Rd to simulate the peak demand from the development. A 6 inch PVC watermain was assumed within the development. The diurnal pattern used in our analysis includes a maximum peaking factor of 3.2 to create a total peak hour demand of 87.2 gpm, the peak demand calculated for the development in accordance with industry standards and an assumption of 76 new customers.

At peak demand, with both PRVs set to their existing pressures, the model results show a pressure of 61 psi at the location of the proposed development. Peak flows through the 8 inch main on Old Sligo Rd are approximately 90 gpm. Pressures in the surrounding area are also between 35 and 150 psi. In addition, a flushing velocity of 4.2 fps can be achieved in the main while maintaining pressures of 20 psi or greater throughout the distribution system. This analysis confirms that the District has the capacity to serve the proposed development.

A second scenario was modeled to determine the maximum flow that could be delivered by the system to the proposed development while maintaining a minimum of 20 psi throughout the system. For this scenario, an elevation of 842 ft was used since it would be the highest flushing elevation possible in the development (approximately 2 feet above the street). The scenario was modeled with the PRVs on (in use) and off (bypassed). The results are shown in Table 1.

Hydraulic modeling indicated that the maximum flow which could be delivered to the development is 495 gpm at an elevation of 842 ft. Additional modeling was also performed with the elevation of development at 800 ft, the average elevation within the proposed development, which indicated that the system could deliver a maximum flow of 511 gpm.

Table 1. Results of maximum flow scenario in hydraulic model

	Description of Scenario			Maximum Flow at
Scenario	Elevation of	PRV 1	PRV 2	Prop. Development
	Development (ft.)			(gpm)
1	842	ON	ON	445.6
2	842	OFF	ON	495.3
3	842	ON	OFF	445.6
4	842	OFF	OFF	495.3
5	800	ON	ON	445.6
6	800	OFF	ON	511.8
7	800	ON	OFF	445.6
8	800	OFF	OFF	511.8

#### **Summary**

The hydraulic analysis results indicate that the District's system can provide adequate pressure and flow during peak residential demands, while using the existing PRVs. The hydraulic analysis results also indicate that the system has the current capacity to deliver a maximum flow greater than 500 gpm to the proposed development if the elevation of all flushing valves is 838 ft or less. However, PRV 1 or both PRVs must be bypassed.

The District will need to continuously bypass either PRV 1 or both PRVs to achieve maximum flushing flows to the proposed development once it is constructed. The District may need to perform additional pressure testing in areas of low elevation and provide pressure reducing valves to individual customers on their service lines if necessary. Elevations of flushing valves within the proposed development should also not exceed 838 ft.

Please let us know if you have any questions or if we can be of any further assistance.

Sincerely,

Lucy Pacholik, PE Project Engineer

Lucy C. Panin

# 1 d) EXPLAIN WHY NUMBERED PARAGRAPGH 8, WHICH STATES THAT THE AGREEMENT MAY BE ENFORCED BY AN ACTION IN HENRY CIRCUIT COURT, WAS INCLUDED IN THE AGREEMENT

Responsible Party (Cliff Ashburner of Dinsmore & Stohl LLP)

### **HENRY COUNTY WATER DISTRICT #2**

#### PSC CASE NO. 2024-00325

### RESPONSE TO REQUEST FOR INFORMATION

### **PSC'S REQUEST FOR INFORMATION DATED JULY 18TH 2025**

Request #2 REFER TO THE MAY 23<sup>RD</sup>, 2025 LETTER FROM THE LAW FIRM OF STROBO BARKLEY, PAGE 2 OF 4. EXPLAIN HOW THE AGREEMENT COMPLIES WITH THE STATEMENT IN HENRY DISTRICT #2'S TARIFF THAT STATES "NO FIRE HYDRANTS SHALL BE ALLOWED TO BE INSTALLED IN ANY PROPOSED WATER FACILITY EXCEPT IN THE INDUSTRIAL PARK NEAR CAMPBELLSBURG

Responsible Party (Keith Morris Henry County Water)

It was the District's understanding that 'in any proposed water facility' pertained to anything constructed on the Districts main lines not on a metered private water main