

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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|-------------------------------------|---|---------------------|
| APPLICATION OF NORTHERN KENTUCKY |) | |
| WATER DISTRICT FOR A CERTIFICATE OF |) | |
| CONVENIENCE AND NECESSITY FOR |) | CASE NO. 2011-00128 |
| PROPOSED IMPROVEMENTS TO ITS TAYLOR |) | |
| MILL WATER TREATMENT PLANT |) | |

COMMISSION STAFF'S FIRST INFORMATION REQUEST
TO NORTHERN KENTUCKY WATER DISTRICT

Pursuant to 807 KAR 5:001, Commission Staff requests that Northern Kentucky Water District ("Northern District") file with the Commission no later than July 15, 2011, the original, two paper copies and an electronic copy of the following information, with a copy to all parties of record. Each copy of the information requested shall be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention shall be given to copied material to ensure its legibility.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Northern District shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Northern District fails or refuses to furnish all or part of the requested information, Northern District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Describe Northern District's current plans, aside from the proposed facilities, to expand the capacity of other facilities of the Taylor Mill Water Treatment Plant.
2. Describe Northern District's contingency plans for providing water service to its customers in the event of a service disruption at the Fort Thomas Water Treatment Plant.
3.
 - a. State the maintenance costs associated with the use of vegetative roofs and compare these costs to those associated with the use of standard roofs.
 - b. State whether the costs associated with the maintenance of vegetative roofs are reflected in "Additional Costs and O&M" set forth in Exhibit D of Northern District's Application.
 - c. State the difference in the proposed facilities' cost resulting from the use of the vegetative roofs instead of standard roofs.

d. For each structure in which a vegetative roof is proposed, state the additional cost of the structure that is attributable to structural features necessary to support the additional weight of a vegetative roof.

e. (1) State whether it would be feasible and desirable to expand the proposed detention basin to compensate for the use of a standard roof. Explain.

(2) If it is feasible to expand the proposed detention basin to compensate for the use of a standard roof, state the cost of such expansion.

4. Describe the difference, if any, in the operation of post-filtration granular activated carbon ("GAC") adsorption facilities in winter periods and summer periods.

5. Describe the effect on Northern District's compliance with the Stage 2 Disinfectants and Disinfectant Byproduct ("Stage 2 D/DBP") Rule if two or more GAC vessels are simultaneously out-of-service.

6. a. State whether Northern District has acquired additional real estate for the proposed project.

b. If Northern District has acquired additional real estate for the proposed facilities, state the amount of real estate acquired, the date of the acquisition, and its purchase cost.

c. State the cost to prepare any additional real estate acquired for the proposed facilities. Describe the nature of the site preparation.

d. State whether all of the acquisition and site preparation costs associated with any additional real estate acquired for the proposed facilities is included in the estimated project cost of \$35 million.

e. If all acquisition and site preparation costs associated with any additional real estate acquired for the proposed facilities is not included in the estimated project cost of \$35 million, identify the source of funding for these costs.

7. Refer to Malcolm Pirnie, Inc., Taylor Mill Advanced Treatment Improvements Basis of Design (Mar. 2009) at 10-1. Provide the permits listed below. For each permit that has not been issued, provide the request or application for such permit and state the current status of the request for the permit.

- a. Encroachment Permit (Kentucky Transportation Cabinet);
- b. Grading, Erosion Control and/or Land Disturbance Permit (Sanitation District No.1 of Northern Kentucky);
- c. Local Road/Street Encroachment Permit;
- d. Kentucky Housing and Building Code Enforcement Review;
- e. Local Building Permit; and
- f. Plumbing Permit.

8. a. State the length of time that the Taylor Mill Water Treatment Plant will be out of service during the proposed construction.

b. Describe how Northern District expects to meet demand during service interruptions.

9. Refer to Northern District's Application, Exhibit D.

a. Provide a breakdown of the projects included in miscellaneous costs and contingencies of \$4,431,720.

b. Provide all correspondence, internal memoranda, notes, and electronic mail messages in which the need for these costs was discussed.

c. State whether Northern District intends to request bids on all miscellaneous costs and contingencies. If no, identify each component for which no bids will be requested and explain why no bids will be requested.

10. Refer to Northern District's Application, Exhibit D. For each listed component of "Additional Costs and O&M," provide a breakdown of the component and show all calculations used to determine the additional O&M annual cost as presented.

11. State whether the two power generators included in the proposed construction are also intended to power the Taylor Mill Water Treatment Plant's raw water intake in the event of power outage.

12. Describe the exercise plan that Northern District will use for the proposed power generators.

13. Describe Northern District's residual management program for conventional/GAC processes. This description shall identify and describe all required permits necessary for the program's operation.

14. Refer to Plan Sheet M-09-202. Describe the need to locate a one-inch sodium hypochlorite feed line in the proposed rapid mix area in light of the Stage 2 D/DBP Rule.

15. Refer to Plan Sheet S-06-301, Section 16. Section 16 shows a three-foot diameter drilled pier. The #7 steel reinforcement is distributed at four locations along the vertical and horizontal axes in a formation of three rebars spaced at five and one-half inches and totaling 12 rebars at a cumulative perimeter length of 44 inches. In the same cross-section, there also appear areas without any reinforcement for a cumulative

perimeter length of 56 inches in the diagonal directions between the reinforced vertical and horizontal axes. Explain the rebar spacing in the cross-section.

16. List and describe each existing system redundancy in the Taylor Mill Water Treatment Plant. Explain how each redundancy lessens the risk of service disruption or enhances service reliability.

17. List and describe system redundancy in the proposed facilities. Explain how each redundancy will lessen the risk of service disruption or enhance service reliability.

18. For each of Northern District's water treatment plants, state Northern District's estimated costs for additional sampling and testing required to comply with the Stage 2 D/DBP Rule. Show all calculations and state all assumptions used to develop this estimate.

19. Refer to Malcolm Pirnie, Inc., Taylor Mill Advanced Treatment Improvements Basis of Design (Mar. 2009) at 4-7. Provide a copy of the geotechnical consultant's report and recommendations.



Jeff Derouen
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DATED: JUL 01 2011

cc: Parties of Record

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