

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF MUHLENBERG COUNTY)
WATER DISTRICT #3 REQUESTING DEVIATION)
FROM REQUIREMENTS OF 807 KAR 5:066,) CASE NO. 2016-00421
SECTION 4(4))

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MUHLENBERG COUNTY WATER DISTRICT #3.

Muhlenberg County Water District #3 ("Muhlenberg #3"), Pursuant to 807 KAR 5:001, shall file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

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 the 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.

Muhlenberg #3 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 Muhlenberg #3 fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. 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 filling a paper containing personal information, Muhlenberg #3 shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. State whether Muhlenberg #3 has interconnection(s) for obtaining a supply of water from a water utility other than Central City Municipal Water and Sewer System ("Central City"). If applicable, identify each water utility supplying Muhlenberg #3 other than Central City, the point(s) of interconnection, and the average daily receipt or purchase of water from that utility in gallons for the period running from January 1, 2015, through December 31, 2016.

2. State whether Muhlenberg #3 has interconnection(s) for supplying water to a water utility. If applicable, identify each water utility that Muhlenberg #3 has an obligation to supply, the point(s) of interconnection, and the average daily delivery or sale of water to that utility in gallons for the period running from January 1, 2015, through December 31, 2016.

3. Provide a copy of Muhlenberg #3's current contract with Central City.

4. Refer to the November 22, 2016 letter from David Rhoades, city Administrator, Central City, Kentucky, to Muhlenberg #3 ("Storage Letter") supplied with the request for a deviation and provide the following.

a. The Storage Letter states that Central City "can and will reserve 700,000 gallons of water specifically for your system as storage." Explain whether Muhlenberg #3 has the exclusive use of the 700,000 gallons of water storage in the event of an emergency. If it does not, explain why the storage should be included in determining the storage capacity of Muhlenberg #3.

b. The Storage Letter does not state the term of Central City's commitment to reserve storage capacity in favor of Muhlenberg #3. State whether Central City has indicated a willingness to reserve the capacity in favor of Muhlenberg #3 for the remainder of the term of Central City's current contract with Muhlenberg #3.

c. State how Muhlenberg #3 and Central City will determine the rights and obligations of the parties concerning the reservation of capacity described in the Storage Letter. Include with the response to this sub-part a discussion of whether Muhlenberg #3 and Central City anticipate executing an amendment to their current water supply contract to include Central City's reservation of storage capacity on behalf of Muhlenberg #3.



Talina R. Mathews
Executive Director
Public Service Commission
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DATED JAN 13 2017

cc: Parties of Record

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