

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF WESTERN FLEMING COUNTY)
WATER DISTRICT REQUESTING A DEVIATION)
FROM REQUIREMENTS OF 807 KAR 5:066,) CASE NO. 2016-00424
SECTION 4(4))

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO WESTERN FLEMING COUNTY WATER DISTRICT

Western Fleming County Water District ("Western Fleming"), pursuant to 807 KAR 5:001, is to 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.

Western Fleming 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 Western Fleming 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, Western Fleming shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Western Fleming's response to Staff's First Request for Information ("Staff's First Request") Item 1.c., and state why "[a]dditional storage would only increase the likelihood of high TTHMs [trihalomethanes]."

2. Refer to Western Fleming's response to Staff's First Request, Item 6:

- a. Provide a supporting schedule that demonstrates the calculation of the approximate 375,000 gallons per day identified by Western Fleming as its customers' demand, and also a calculation of the per-day amount using the Water Statistics information in the *Annual Report of Western Fleming County Water District for Year Ended December 31, 2015* ("Annual Report") at page 61 of 71;

- b. Confirm that the approximate 100,000-gallon amount identified by Western Fleming as purchased from Greater Fleming County Regional Water Commission ("Greater Fleming") and the approximate 275,000-gallon amount identified

by Western Fleming as the amount produced by Western Fleming are both per day amounts. If either is not a per-day amount, identify the measurement period for each amount.

c. Provide a supporting schedule that demonstrates the calculation of the approximate 100,000-gallon amount identified by Western Fleming as its purchases from Greater Fleming, and also a calculation of the amount using the Water Statistics information at page 61 of 71 of the Annual Report; and

d. Provide a supporting schedule that demonstrates the calculation of the approximate 275,000-gallon amount identified by Western Fleming as its water production, and also a calculation of the amount using the Water Statistics information at page 61 of 71 of the Annual Report.



Talina R. Mathews
Executive Director
Public Service Commission
P.O. Box 615
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DATED APR 18 2017

cc: Parties of Record

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