

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO THE)	
IMPACT OF MADISON COUNTY FISCAL)	CASE NO.
COURT'S USE OF MADISON COUNTY)	2021-00422
UTILITIES DISTRICT'S SYSTEM FOR ITS FIBER)	
OPTIC CABLE INSTALLATION PROJECT)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO MADISON COUNTY UTILITY DISTRICT

Madison County Utility District (Madison District) pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on March 14, 2022. The Commission directs Madison District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

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

Careful attention shall 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Madison District 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 responses to the Commission Staff's First Request for Information filed February 14, 2022 (Staff's First Request), Item 2.

a. The response states that that Madison County Emergency Management Agency/Chemical Stockpile Emergency Preparedness Program (EMA/CSEPP) or its contractor will be onsite as soon as Madison District crews arrive. Explain in detail how EMA/CSEPP or its contractor will take no longer to be onsite for a water main break than Madison District crews.

b. Provide a copy of the contract, if one exists between Madison County Fiscal Court, Madison District, or EMA/CSEPP.

c. Explain the requirements, if any, in an agreement between Madison County Fiscal Court and Madison District that EMA/CSEPP crews be onsite for a water main break no later than Madison District.

d. Indicate the penalties, if any, should Madison County EMA/CSEPP crews not arrive onsite for a water main break no later than Madison District arrives onsite for a water main break.

e. For the previous three years, indicate the number of main breaks repaired after normal business hours, or repairs extended past normal business hours, for Madison District.

2. Refer to the response to Staff's First Request, Item 6b. The answer is unresponsive. Match the specific hydrants identified in the list provided with each link in the project plans.

3. Refer to the responses to Staff's First Request, Item 7. The answer is unresponsive and stated in terms of a hypothetical situation.

a. Indicate the C-factor that was assumed in pipe calculations of pressure loss in the Hydraulic Regime or indicate why you do not have this information.

b. Explain if the C-factor was confirmed through field testing or hydraulic modelling of the system, and if not, explain why testing or modelling was not conducted.

4. Refer to the response to Staff's First Request, Item 8a. Indicate whether Madison County EMA/CSEPP or anyone from Madison County contacted the electric provider along the project route to determine if free pole attachments or reduced rates for pole attachments were available for this project.

5. Refer to the response to Staff's First Request, Item 9d. Identify where a presentation took place for Kentucky American Water representatives of CRALEY and list the specific representatives from Kentucky American Water that were present.

6. Refer to the response to Staff's First Request, Item 10a.

a. Indicate any impact to the overall fiber system or emergency communications system if this is the only segment of CRALEY installation that occurs.

b. If so, explain how that will impact the efficiency of the network proposed.

c. Explain whether other segments may be constructed using other methods.

7. Refer to the response to Staff's First Request, Item 12a.

a. Identify the person or persons from HMB engineering who prepared the engineering study.

b. Indicate Mike Parker's credentials as an engineer.

c. Indicate whether Mike Parker is licensed to practice engineering in the Commonwealth of Kentucky.

d. Indicate whether Madison District intends to file Final Engineering Plans and Specifications including a hydraulic analysis for the project with the Division of Water in response to the letter from the Division of Water filed December 13, 2021.

e. If so, indicate when Madison District plans to file.

f. If not, explain why.

8. Refer to the response to Staff's First Request, Item 13a. This response is unresponsive.

a. Identify the anticipated pressure and flow loss during a fire flow at the hydrant furthest along Lexington Road due solely to the fiber installation at an average day and peak day system demand.

b. Identify the person preparing the analysis, the assumptions used, and method of calculations.

9. Refer to the response to Staff's First Request, Item 14. The answer is unresponsive.

a. Indicate whether Madison District owns any private easements for any length of the project.

b. If so, indicate how much of the project, as a percentage of the overall project length, will be installed in water mains that currently lay in existing private easements.

c. Explain whether all of the existing easements are documented and recorded at the Madison County Clerk's Office.

d. Indicate whether any of these are easements by prescription.

e. If so, indicate how much is a footage of mains.

f. Indicate how much of the project, as a percentage of the total project, will be installed in water mains that currently lay in public right-of-way owned by the Commonwealth of Kentucky.

g. Indicate how much of the project, as a percentage of the total project, will be installed in water mains that currently lay in public right-of-way owned by either the city of Richmond or Madison County.

10. Refer to the response to Staff's First Request, Item 16b. Provide a copy of the legal opinion that states that all of the current easements are broad enough to allow for all appurtenances "connected with" the water line.

11. Refer to the response to Staff's First Request, Item 16b.

a. Indicate whether any vaults will be installed in public right-of-way.

b. Indicate whether Madison District received any necessary permits for that installation.

c. If not, explain why.

12. Refer to the response to Staff's First Request, Item 17a.

a. Identify the cost of the sensing technology.

b. Explain whether Madison District considered purchasing and using the technology.



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DATED FEB 25 2022

cc: Parties of Record

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