

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BLUEGRASS)	
WATER UTILITY OPERATING COMPANY, LLC)	CASE NO.
FOR CERTIFICATES OF PUBLIC)	2022-00046
CONVENIENCE AND NECESSITY FOR)	
PROJECTS AT THE PERSIMMON RIDGE SITE)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC

Bluegrass Water Utility Operating Company, LLC (Bluegrass Water), 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 April 7, 2022. The Commission directs Bluegrass Water 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.

Bluegrass Water shall make timely amendment to any prior response if Bluegrass Water 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 Bluegrass Water fails or refuses to furnish all or part of the requested information, Bluegrass Water 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, Bluegrass Water 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 Application, pages 3–4, paragraph 10.
 - a. Provide copies of all plans, specifications, drawings, manufacturer's information sheets pertaining to the moving bed biofilm reactor (MBBR) treatment system Bluegrass Water plans to install at the Persimmon Ridge facility.
 - b. Provide a detailed description of the MBBR treatment system Bluegrass Water plans to install and how it will be integrated into the current systems at the Persimmon Ridge facility.

2. Refer to the Application, pages 3–4, paragraph 10. Provide copies of all documentation reviewed or generated relating to the decision to construct the MBBR treatment system.

3. Refer to the Application, pages 3–4, paragraph 11. Explain how Bluegrass Water estimated the cost of constructing the MBBR system and provide copies of all documents used to determine the estimated cost of constructing the MBBR system.

4. Refer to the Application, pages 3–4, paragraph 10. State what current measures the Persimmon Ridge facility uses to remove nutrients and lower ammonia levels.

5. Refer to the Application, pages 3–4, paragraph 10. State permitted limits of nutrient and ammonia levels.

6. Refer to the Application, pages 3–4, paragraph 10. Provide all documents reflecting testing of nutrient and ammonia levels and explain why Bluegrass Water contends that the levels need to be reduced.

7. Refer to the Application, pages 3–4, paragraph 10. State expected reductions in nutrient and ammonia levels upon installation of MBBR system.

8. Refer to the Application, pages 3–4, paragraph 10. Describe any alternatives to installation of the MBBR system for reducing nutrient and ammonia levels.

9. Refer to the Application, pages 3–4, paragraph 10. Provide estimated costs of any alternatives described in Bluegrass Water’s response to Request No. 8 above.

10. Refer to the Application, page 5, paragraph 14.

a. Confirm that Bluegrass Water’s proposed improvement will not impact operational costs (i.e., electricity, sludge removal, maintenance, chemicals, etc.).

b. If Bluegrass Water's response to Item 10.a is no, provide Bluegrass Water's estimates of the operational costs impacts identified. Include documentation and detailed calculations to support the identified cost impacts.

c. State whether the projects are expected to affect the useful lives of the Persimmon Ridge wastewater treatment plant (WWTP) or collection system. If so, describe the extent to which they are expected to affect the useful lives.

d. Provide the estimated Depreciation expense for each proposed asset that will be added to Bluegrass Water's plant in service. Include documentation and detailed calculations to support calculated depreciation expense impacts.

11. Describe and provide a copy of any cost benefit analysis performed by Bluegrass Water with respect to the proposed project.

12. Provide a copy of any engineering reports or analyses prepared by or on behalf of Bluegrass Water assessing the condition of the Persimmon Ridge WWTP or collection system or discussing any improvements or repairs recommended for the Persimmon Ridge WWTP or collection system.

13. Provide any correspondence between Bluegrass Water and any third-party engineering firm regarding the condition of or discussing any improvements or repairs recommended for the Persimmon Ridge WWTP or collection system.

14. Identify the contractor or contractors that will complete the work on each project, if any, and explain the process by which Bluegrass Water identified and retained the contractors. If Bluegrass Water has not retained a contractor but intends to do so, explain the process by which Bluegrass Water will identify and retain a contractor.

15. Provide copies of any Agreed Orders Bluegrass Water has entered into with the Energy and Environment Cabinet (EEC) for the Persimmon Ridge facility and any applicable Corrective Action Plan for the Persimmon Ridge facility.

16. Provide all reports Bluegrass Water has made to the EEC, if any, regarding its efforts to bring the Persimmon Ridge facility within compliance and any correspondence received regarding the same from EEC.

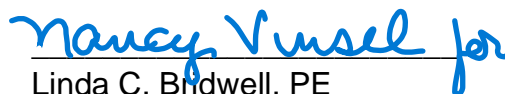
17. Provide any citations or notices of violations received by Bluegrass Water from the EEC or the Environmental Protection Agency for violations at the Persimmon Ridge facility.

18. Provide any correspondence Bluegrass Water has received from the EEC's Division of Compliance or Division of Water regarding the Persimmon Ridge facility.

19. Provide a copy of the current discharge permit for the Persimmon Ridge WWTP.

20. State when Bluegrass Water anticipates beginning the project identified in the Application and when it anticipates completing each project and placing it in service.

21. State whether the Persimmon Ridge facility will be out of service during any part of the construction. If so, state the frequency and duration of expected periods in which the facility will be out of service.



Linda C. Bidwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED MAR 31 2022

cc: Parties of Record

*Kathryn A Eckert
McBrayer PLLC
201 East Main Street
Suite 900
Lexington, KENTUCKY 40507

*Katherine Yunker
McBrayer PLLC
201 East Main Street
Suite 900
Lexington, KENTUCKY 40507

*Bluegrass Water Utility Operating Company, LLC
1650 Des Peres Road, Suite 300
St. Louis, MO 63131