

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 SECOND 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 May 19, 2022. The Commission directs Bluegrass Water to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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 Bluegrass Water's response to Commission Staff's First Request of Information (Staff's First Request), Item 1 and the attachments thereto.
  - a. State whether the Persimmon Permit Set and the Persimmon Technical Specifications include projects other than the moving bed biofilm reactor (MBBR) project proposed in this matter.

b. If so, identify those portions of the Persimmon Permit Set and the Persimmon Technical Specifications that describe the MBBR project proposed in this matter and those that describe other projects.

2. Refer to Bluegrass Water's response to Staff's First Request, Item 9

a. Explain how Bluegrass Water estimated the cost of constructing the alternatives.

b. Provide the remaining useful life of the current Persimmon Ridge Wastewater Treatment Plant (WWTP), or the major components thereof, and the net plant in service for current Persimmon Ridge WWTP.

c. Provide the expected useful life of the algae wheel growth treatment system.

d. Explain how the operating expenses of the algae wheel growth treatment system would compare to the operating expenses of the MBBR project proposed in this matter, and explain each basis for your response, including the likely costs of maintenance and repairs for each system.

3. Refer to KY2022-00046\_BW\_0370 provided in Bluegrass Water's response to Staff's First Request, Item 18. Explain whether any additional approval is needed from the Energy and Environment Cabinet, Department of Environmental Protection for the MBBR project proposed herein.

4. Provide the distance between the Persimmon Ridge system and the closest point at which its facilities could be attached to the nearest known wastewater facilities.

5. Provide any information and documentation regarding availability, feasibility, and cost of connecting Persimmon Ridge system to any other wastewater treatment system.

6. Identify and describe any projects Bluegrass Water currently anticipates completing in the next five years for the Persimmon Ridge system, and provide the estimated cost of the projects.

7. Identify all projects that Bluegrass Water has completed at the Persimmon Ridge system and the date each such project was placed in service, briefly describe the purpose of each such project, and provided the estimated and final cost of each such project.

8. Provide an update on the status of Bluegrass Water's efforts to obtain debt financing, including when Bluegrass Water anticipates requesting approval for the same.

9. State whether funding the project proposed in this matter with equity financing would affect Bluegrass Water's ability to fulfil its plan filed in Case No. 2019-001042<sup>2</sup> to achieve a capital structure with at least 50 percent debt financing.

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<sup>2</sup> See Case No. 2019-00104, *Electronic Proposed Acquisition by Bluegrass Water Utility Operating Company, LLC and the Transfer of Ownership and Control of Assets by P.R. Wastewater Management, Inc., Marshall County Environmental Services, LLC, LH Treatment Company, LLC, Kingswood Development, Inc., Airview Utilities, LLC, Brocklyn Utilities, LLC, Fox Run Utilities, LLC, Brocklyn Utilities, LLC, and Lake Columbia Utilities, Inc.* (filed Oct. 31, 2019), Notice and Plan Re: Capital Structure.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED   MAY 05 2022  

cc: Parties of Record

Case No. 2022-00046

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