

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BLUEGRASS)	
WATER UTILITY OPERATING COMPANY, LLC)	
FOR CERTIFICATES OF CONVENIENCE AND)	CASE NO.
NECESSITY FOR THE INSTALLATION OF)	2022-00216
MONITORING EQUIPMENT AND FOR A)	
CORRESPONDING LIMITED WAIVER OF DAILY)	
INSPECTION REQUIREMENTS)	

COMMISSION STAFF'S THIRD 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 January 6, 2023. 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

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).

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.

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 and scanned 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 the Application, paragraph 50, in which it states that High Tide offers satellite connections which make it easier to receive communications from rural areas.

- a. State which facilities identified in the Application, if any, require satellite communications in order to provide remote data.

b. For facilities that do not require satellite communications in order to provide remote data, explain in detail what is meant by satellite communications making it easier to receive communications from rural areas.

c. Explain how the remote monitoring system obtains data from facilities if satellite communication is not available. If different facilities' data is collected in different ways, explain the differences and which facilities' data is collected each way.

2. Refer to the Application, paragraph 46, identifying the three available remote monitoring manufacturers, and Bluegrass Water's Response to Commission Staff's First Request for Information (Staff's First Request), Item 15. The information provided in the response to Staff's First Request, Item 15 is nonresponsive.

a. For Omni and Mission, state the estimated cost to purchase and install the remote monitoring system most comparable to the High Tide system selected by Bluegrass Water.

b. State what expenditure, if any, is necessary to add the existing Mission remote monitoring equipment to the High Tide system.

c. For all three manufacturers, provide an estimated itemized annual operations and maintenance expense, including costs of electric use, any software licenses, service contracts, or any other repeating cost.



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DATED DEC 15 2022

cc: Parties of Record

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