

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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

Bluegrass Water Utility Operating Company, LLC (Bluegrass Water), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on February 8, 2023. 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

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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).

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 5:001E, 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 Third Request for Information (Response to Staff's Third Request), Item 1(a)-(c).

- a. For the Kentucky facilities currently using Mission brand monitoring equipment, state whether the cell-based communication is periodic or constant, and if periodic, state the time interval between communications attempts.

b. For the Kentucky facilities currently using Mission brand monitoring equipment, state how often the cell-based communication fails to connect for each facility.

c. Provide logs, if any, of communication failures identified in your response to Item 1(b) above.

2. Refer to Response to Staff's Third Request, Item 2(b), stating "Moreover, the main boards in the existing Mission enclosures are now out of warranty and thus are due for a replacement, any event."

a. Explain why the main boards being out of warranty would require them to be replaced.

b. State whether Bluegrass Water plans to replace main boards or other equipment every time its warranty expires. If so, state how often this would occur and at what cost.

3. Refer to Response to Staff's Third Request, Item 2(c), stating "As for electric usage, the High Tide equipment is also more efficient than the Mission equipment. Mission uses four times the amount of electricity (approximately 4.2 watts per unit) that High Tide (approximately 1 watt per unit) does."

a. State the estimated annual electricity expense for High Tide and Mission.

b. State the annual electricity expense for each of the Kentucky facilities currently using Mission brand monitoring equipment.

4. Refer to Bluegrass Water's response to Commission Staff's First Request for Information (Response to Staff's First Request), Exhibit 24.

a. Verify that the correct construction cost for the project proposed in your application are \$134,302, as totaled in the "Projected Cost" column.

b. State whether the \$18,900 in costs to modify existing Mission brand equipment to work with the High Tide system is included in any of the sums listed in Exhibit 24.

c. If not, state whether the \$18,900 will be capitalized.

5. Refer to Bluegrass Water's Response to Staff's First Request, Items 18 through 21, regarding operations cost savings if a deviation from 807 KAR 5:071, Section 7(4) is granted.

a. Provide copies of current operator contracts for all Kentucky facilities.

b. Provide copies of proposals for amended operator contracts be put into effect if a deviation from 807 KAR 5:071, Section 7(4) is granted.

c. Provide all invoices and facility site visit logs from Kentucky operators since Bluegrass Water acquired the facilities referenced in Response to Staff's First Request, Exhibit 24.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
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DATED   JAN 19 2023  

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