

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 A DRAIN FIELD AT THE)	2024-00170
MARSHALL RIDGE SYSTEM OR AN ORDER)	
DECLARING THE INSTALLATION IS AN)	
EXTENSION IN THE ORDINARY COURSE OF)	
BUSINESS)	

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, shall file with the Commission an electronic version of the following information. The information requested is due on September 5, 2024. 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

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).

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 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 Application, page 10, paragraph 12.
 - a. State whether Bluegrass Water plans to seek rate recovery for the construction costs for the project described in the application. If so, explain the timing for seeking rate recovery. If not, explain the reasoning supporting that decision.

b. State the depreciation rate(s) to be used for the described project by component, if necessary.

2. Refer to Application, page 8, paragraph 36.

a. Explain the purpose and function of the drain field of the Marshall Ridge wastewater facility (Facility).

b. Explain how cracks and leaks in the drain field result in stagnant water ponding on the surface.

c. Explain how ponding of stagnant water in the drain field affects the ability of the drain field to function or results in violation of applicable health department requirements.

3. Refer to Application, pages 1-2, paragraph 2.

a. Explain "...the Company's efforts to limit effluence violations and improve overall safety and service quality at the Facility."

b. Identify all effluent violations or discharges from the Facility observed by or reported to Bluegrass Water, its employees or independent contractors hired by Bluegrass Water, since 2019. Specifically identify the number of effluent violations, the magnitude of the violations and whether the effluent levels for each violation are determined permit or regulation. If by regulation, identify the specific regulation.

c. Identify all issues with the "safety and service quality" observed by or reported to Bluegrass Water, its employees or independent contractors hired by Bluegrass Water at the Facility since 2019.

d. Identify all Purchase District Health Department (PDHD) violations related to the Facility since 2019 and provide copies of any documents provided by PDHD to Bluegrass Water or provided to PDHD by Bluegrass Water referencing these violations.

4. Refer to Application, page 8, paragraph 37 and Case No. 2020-00028,² Application at 10, paragraph 27.

a. Identify any alternative methods Bluegrass Water considered instead of building a new drain field and explain why these alternatives were not selected, including connecting to the Paducah McCracken County Joint Sewer Agency (JSA).

b. Provide the coordinates of nearest sanitary sewer line to the Facility.

c. Provide the estimated cost of any alternative methods Bluegrass Water considered instead of building a new drain field, including remediating the existing drain field and connecting to JSA.

d. Provide the estimated useful life of any equipment necessary to implement alternative methods Bluegrass Water considered instead of building a new drain field.

5. Describe any environmental compliance or safety measures necessary to abandon the existing drain field and provide estimated costs.

6. State whether Bluegrass Water or any person or entity acting on its behalf has performed any evaluation of subsurface conditions that could increase the cost of the proposed project. If not, explain why not and describe any such possible subsurface conditions and estimated cost increases associated with these conditions.

² Case 2020-00028, *Electronic Proposed Acquisition by Bluegrass Water Utility Operating Company, LLC of Wastewater System Facilities and Subsequent Tariffed Service to Users Presently Served by Those Facilities* (filed Feb. 24, 2020), Application.

A handwritten signature in blue ink, appearing to be 'L. C. Bridwell', written over a horizontal line. To the right of the signature, the letters 'P.R.' are written in blue ink.

Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED AUG 20 2024

cc: Parties of Record

Case No. 2024-00170

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