

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF THE ALLEN)	
COUNTY WATER DISTRICT FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE AND)	
NECESSITY TO CONSTRUCT A SYSTEM)	CASE NO.
IMPROVEMENTS PROJECT AND AN ORDER)	2024-00118
AUTHORIZING THE ISSUANCE OF SECURITIES)	
PURSUANT TO THE PROVISIONS OF KRS)	
278.300)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO ALLEN COUNTY WATER DISTRICT

Allen County Water District (Allen District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on July 17, 2024. The Commission directs Allen District 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.

Allen District shall make timely amendment to any prior response if Allen District 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 Allen District fails or refuses to furnish all or part of the requested information, Allen District 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, Allen District 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 Case No. 2020-00296, Application,² Attachment 8, Asset Depreciation Short Report, page 2 of 8, Asset A/C# 330 – Distribution Reservoirs & Stand.

² Case No. 2020-00296, *Electronic Application of Allen County Water District for an Alternative Rate Adjustment* (filed Sept. 18, 2020), Application.

Identify which tank on the list is the Walkers Chapel Standpipe that is proposed to be replaced.

2. Provide the current book value for the Walkers Chapel Standpipe that is proposed to be replaced.

3. Refer to the Application,³ Exhibit A, Project Necessity and Project Description. The Project description states that the existing glass lined standpipe has significant corrosion and is cycling excessively.

a. Describe any previous planned or unplanned preventative maintenance, parts replacement, and repairs performed on the standpipe. Include dates and expenditures. In addition, identify and describe any instances of deferred maintenance on the standpipe and provide a discussion of basis underlying the decisions to defer maintenance.

b. Describe in detail what “cycling excessively per KDOW requirements” means and how the replacement tank will address the issue. Explain whether the tank’s current operation is out of compliance with any applicable regulations or statutes.

4. Refer to the Application, Project Necessity and Project Description. In the Description Allen District states that it intends to perform the site work itself.

a. Provide an explanation of what tasks the site work will entail.

³ Case No. 2024-00118, *Electronic Application of the Allen County Water District for a Certificate of Public Convenience and Necessity to Construct a System Improvements Project and an Order Authorizing the Issuance of Securities Pursuant to the Provisions of 278.300* (filed May 13, 2024), Application.

b. Provide a breakdown of the projected cost of performing the site work with inside labor, including projected overtime hours and cost of additional equipment rentals, supplemental insurance coverage, or other items.

c. Explain whether Allen District's current employees are qualified to perform the site work required.

5. Refer to the Application, Exhibit K, Final Project Budget. State whether the scope of the telemetry work is the same between the Original Project as Bid and the Revised Project Scope. If not, explain the difference in the work being performed.

6. Refer to the Application, Exhibit K, Final Project Budget. State whether the scope of the electric work is the same between the Original Project as Bid and the Revised Project Scope. If not, explain the difference in the work being performed.

7. Refer to the Application, Exhibit K, Revised Project Scope. Explain what Allen District's plans are for the demolition of the existing Walkers Chapel Standpipe given the demolition costs were removed from the project. Provide any projected costs.



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DATED JUL 03 2024

cc: Parties of Record

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