

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 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, shall file with the Commission an electronic version of the following information. The information requested is due on October 18, 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 44 and Bluegrass Water's Response to Commission Staff's First Request for Information (Staff's First Request), Item 4(c).

- a. Provide any engineering reports or other documents used to calculate the cost of the proposed project or determine the need for the project.

b. Provide itemized estimated annual operations and maintenance (O&M) expenses for all Marshall Ridge facility O&M, including with and without the proposed changes.

c. Provide any engineering reports or other documents used to calculate the cost of connecting to the Paducah McCracken Joint Sewer Agency (JSA) system at manhole M01MH2240 as set forth in the attachment labeled Exhibit DR 4(c).

d. Provide itemized estimated O&M expenses for Marshall Ridge if connected to JSA at manhole M01MH2240.

e. Provide documentation of all communications Bluegrass Water, or any parent or affiliate entity of Bluegrass Water, had with JSA regarding the possibility of connecting the Marshall Ridge or Arcadia Pines wastewater facilities to JSA.

f. State whether the Marshall Ridge and Arcadia Pines facilities are within JSA's service territory.

g. State whether JSA has the capacity to accept the effluent from the Marshall Ridge facility individually, Arcadia Pines facility individually, and both facilities together.

h. State whether JSA has indicated that it wants or would allow the Marshall Ridge facility and the Arcadia Pines facility to connect to the JSA sewer system.

i. State whether JSA has indicated that it would charge Marshall Ridge facility customers and Arcadia Pines facility customers a surcharge to recover the cost of extending service.

j. If JSA wants to Marshall Ridge facility or Arcadia Pines facility to connect to the JSA sewer system, state the expected year of completion of this connection.

2. Refer to the maps attached as Appendix A.

a. State whether the maps appear to be a fair and accurate representation of the JSA sanitary sewer system.² If not, explain why not.

b. State whether the Google Satellite map appears to be a fair and accurate representation of the Marshall Ridge and Arcadia Pines facilities. If not, explain why not.

c. State whether a gravity flow connection from the Marshall Ridge facility to JSA manhole M01MH2238 or M01MH2790 is feasible. If not, explain why not.

d. For a gravity flow connection from the Marshall Ridge facility to JSA manhole M01MH2238 and M01MH2790:

i. Provide the estimated capital cost of these potential connections;

ii. Provide an itemized annual O&M expense for each alternative.

e. Based on the proximity of the Marshall Ridge facility to the JSA sanitary sewer lines state whether Bluegrass Water anticipates the drain field would become a stranded asset within its "...50-year effective life"³ due to the application of McCracken County Code of Ordinances Chapter 34 § 34.22 (Attached as Appendix B).

² The JSA GIS interactive map is located at: <https://mapgis-map-gis.hub.arcgis.com/apps/d56a14b36ed84fa99518ac0c01523171/explore>

³ Refer to Bluegrass Water's Response to Staff's First Request, Item 1(b).

3. Refer to Case No. 2020-00028,⁴ Application.
 - a. State how many customers Bluegrass Water serves with its Arcadia Pines facility.
 - b. Provide any engineering reports or other documents referencing any needed repairs or effluent compliance issues for the Arcadia Pines facility.
 - c. Describe any Certificate of Public Convenience and Necessity (CPCN) applications Bluegrass Water expects to file within the next five years regarding the Arcadia Pines facility:
 - i. If the present application is approved;
 - ii. If the present application is denied;
 - iii. If JSA extends service to Marshall Ridge.
 - d. Provide estimated capital costs of:
 - i. Any planned Arcadia Pines projects.
 - ii. Arcadia Pines to connect to JSA if the Marshall Ridge facility were to connect to JSA at manhole M01MH2240.
 - iii. Arcadia Pines to connect to JSA if the Marshall Ridge facility were to connect to JSA at manhole M01MH2238 or M01MH2790.
 - e. Provide an itemized estimated annual O&M expense for:
 - i. Any planned Arcadia Pines projects.
 - ii. Arcadia Pines to connect to JSA if the Marshall Ridge facility were to connect to JSA at manhole M01MH2238 or M01MH2790.

⁴ Case No. 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* (Application filed Feb. 2, 2020).

4. Refer to Bluegrass Water's Response to Staff's First Request, Item 3. Describe any method for temporarily resolving the Department for Environmental Protection Notice of Violation or Cabinet for Health and Family Services Dept. for Public Health Notice to Correct Violations, pending a connection to JSA. Provide estimated costs for any such method.



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DATED OCT 03 2024

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