

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BRONSTON	)	
WATER ASSOCIATION, INC. FOR A	)	
CERTIFICATE OF PUBLIC CONVENIENCE AND	)	CASE NO.
NECESSITY TO CONSTRUCT A SYSTEM	)	2024-00076
IMPROVEMENTS PROJECT AND AN ORDER	)	
AUTHORIZING THE ISSUANCE OF SECURITIES	)	
PURSUANT TO KRS 278.300	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO BRONSTON WATER ASSOCIATION, INC.

Bronston Water Association, Inc (Bronston 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 May 13, 2024. The Commission directs Bronston 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 person

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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).

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.

Bronston Water shall make timely amendment to any prior response if Bronston 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 Bronston Water fails or refuses to furnish all or part of the requested information, Bronston 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, Bronston 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 at Exhibit B describing the proposed waterline replacements and extensions.

- a. State if Bronston Water considered using any material other than PVC, and if so, state what material was considered and why PVC was the least cost, reasonable alternative.

b. State how Bronston Water determine the appropriate diameter of pipe for each section of the project.

c. Explain the need for the extension of approximately 850 LF of 8-inch water line along Colyer Road.

d. State the current age of the existing water lines that Bronston Water is seeking to replace.

e. State the cause of the deterioration of the current water lines that Bronston Water is seeking to replace.

2. Refer to the Application, Exhibit B, stating that the water line replacement project is needed to, among other things, improve “taste problems.”

a. Explain whether customers have complained about taste or how this issue was brought to Bronston Water’s attention.

b. Explain how the proposed project will address that issue.

3. Refer to the Application, Exhibit B, stating that the project will also include installation of approximately 1,180 radio read meters.

a. State whether Bronston Water already owns the 1,180 radio read meters, and if so, when the meters were purchased; the cost of purchasing the meters; and if Bronston Water sought a CPCN from the Commission for the purchase of the meters and if not why.

b. State the make and model of the meters that will be installed.

c. State whether Bronston Water will install the meters or will retain contractors to do so.

d. State whether the meters are replacing existing meters or new customers are being added.

e. State why Bronston Water choose the particular make and model of meter, what alternatives were considered, and why the meters selected were chosen over the alternatives.

f. State if the installation of the radio read meters will also require the purchase and installation of equipment, computers, or software, to read the new meters, and if so, provide the estimated cost of that equipment and state how Bronston Water intends to pay for that equipment.

g. State the expected service life for the proposed meters and provide any engineering reports or manufacturing data that support that expected service life.

4. Refer to the Application, Exhibit B, Public Necessity and Project Description. State who drafted that document.

5. Refer to the Application, Exhibit B, Public Necessity and Project Description, and the Application, Exhibit D, KIA Conditional Commitment Letter dated July 8, 2022, Attachment B.

a. Explain why Exhibit B states that 1,180 meters will be installed but Attachment B to Exhibit D states that 1,900 meters will be installed.

b. State the total number of meters to be installed.

6. Refer to Attachment B to the KIA Conditional Commitment Letter dated July 8, 2022, and Attachment B to the KIA Conditional Commitment Letter dated March 8, 2024, which were filed collectively as Exhibit B to the Application. Refer also to the Application, Exhibit B, Public Necessity and Project Description. Attachment B to the July

8, 2022 letter includes the rehabilitation of a 100,000 gallon storage tank but that rehabilitation project is not included in the March 8, 2024 letter or the Project Description. State whether the rehabilitation of the water tank was removed from the project, and if so, why. If not, explain how that project will be funded and why it was not included in this application.

7. Refer to Application, Exhibit I. Explain the differences in the base bids, Alternate No 1, and Alternate No. 2, and state why the base bid was chosen.

8. State whether there were any other reasons besides lowest cost that caused Bronston Water to select Flo-Line Contracting for the project.

9. State whether Monarch Engineering made any recommendations regarding bid selection, and if so, provide a copy of those documents.

10. Refer to the Application, Exhibit K.

- a. Explain where in the budget, if at all, the installation of the meters is included.
- b. If it is not included, explain how the installation will be funded.
- c. Explain what is included in the \$625,420 Development-Alternates expense.

11. Refer to Bronston Water's 2022 Annual Report in which it reports a total water loss of 12,771,000 gallons, approximately 14.5155 percent.<sup>2</sup> State how much Bronston Water expects that percentage will be improved by the proposed project.

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<sup>2</sup> *Annual Report of Bronston Water to the Public Service Commission for the Calendar Year Ended December 31, 2022 (2022 Annual Report) at 57.*

12. Provide a breakdown showing the number of each type of meter currently used on Bronston Water's system by make and model.

13. State whether Bronston Water currently uses an AMR or AMI system for meter reading, and if so, describe the type of system and identify those meters that Bronston Water currently uses that are compatible with that system.

14. State whether Bronston Water expects to replace all the meters on its system with the radio read meters.

15. Explain how bids were solicited for the proposed project, whether through direct solicitation, publication, or another method. If solicited through publication, provide a copy of the publication and state the days on which it was ran.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED   MAY 01 2024  

cc: Parties of Record

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