

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF HENDERSON COUNTY  
WATER DISTRICT FOR CERTIFICATE OF  
PUBLIC CONVENIENCE AND NECESSITY AND  
APPROVAL OF FINANCING

CASE NO.  
2014-00402

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

Henderson County Water District ("Henderson"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due 14 days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response 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 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.

Henderson shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Henderson fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied 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.

1. Provide the following information regarding the meters that Henderson proposes to purchase.

a. A copy of the September 30, 2013 request for proposal or the solicitation of bids identified in paragraph (d) of the application.

b. A copy of the proposal or bid submitted by Neptune Equipment Company.

c. Refer to the Product Sheet for the T-10 Meter supplied in Exhibit A to Henderson's Verified Response to Deficiency Letter.<sup>1</sup> The Product Sheet states that "Neptune provides a limited warranty with respect to its T-10 meters for performance, materials, and workmanship." State whether the meters purchased will be under a warranty. If applicable, provide a discussion of the terms and conditions of the warranty and include all supporting documentation. If there is no warranty, explain why a warranty is not required.

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<sup>1</sup> Received by the Commission on Dec. 10, 2014.

2. Is a radio frequency meter similar to a radio read meter? If not, identify the differences.

3. State whether Henderson plans to test the meters before placing them into service. If testing is not planned, state whether Henderson will be relying on the meter manufacturer's testing data. Provide the meter manufacturer's testing data.

4. If Henderson will be relying on the meter manufacturer's testing data, state whether it be employing any sampling plan to verify the accuracy of new meters before placing them into service.

5. State whether the new meters will be used to replace meters of existing customers. If so, then provide a summary of the replacement plan.

6. What does the purchase price of \$175.20 per meter, as given in the Application, include? Provide a breakdown.

7. Provide a detailed explanation of the cost-effectiveness and the efficiency of this new meter system.



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Jeff Derouen  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED DEC 22 2014

cc: Parties of Record

Peter R Conrad  
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Henderson County Water District  
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