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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

CANNONSBURG WATER DISTRICT 'S )  
UNACCOUNTED FOR WATER LOSS ) Case No. 2014-00267  
REDUCTION PLAN, SURCHARGE AND )  
MONITORING )

MOTION FOR ENLARGEMENT OF TIME

Comes now the applicant, Cannonsburg Water District by a and through Counsel and hereby moves the Kentucky Public Service Commission for an Order granting it 90 days to submit information requested by the PSC in the above referenced matter states as follows:

During the second week of March, 2015, Counsel for Cannonsburg Water District, "Cannonsburg" learned that on February 6, 2015, the PSC requested certain information from Cannonsburg Water District.

Counsel for Cannonsburg has been out of town since the beginning of February but Counsel's staff checks the regular mail on a daily basis. According to documents retrieved by Counsel, the requests were e-mailed to Counsel and Cannonsburg along with hard copies being sent to the same. Counsel does admit that an e-mail was sent to his personal email account and was inadvertently over-looked due to the large volume of emails received during the months of January, February and March. However, no such hard copy was ever received.

After Counsel learned of the requests, Counsel on March 12th, faxed a copy of the PSC requests to Cannonsburg. Counsel questioned the Manager of Cannonsburg,

Danny Clarkson, as to whether Cannonsburg had received an email containing the requests or a hard copy of the same. Mr. Clarkson, denies that he received the requests by e-mail or a hard copy via United States Postal Service until I faxed the Request for Information to him on March 12, 2015. A copy of letter stating the above is attached and marked as Exhibit "A". Also, incorporated is part of the information requested.

The 90 day request is premised upon the fact that it will at least take 30 days to install the new meters and take an 60 days to compile 2 months of data associated to the new meters after installation.

WHEREFORE, Cannonsburg Water District, formally requests an Order granting it 90 days to provide the answers to the PSC's Requests for Information.

Respectfully submitted,




Kevin P. Sinnette  
2706 Louisa Street  
P.O. Box 532  
Catlettsburg, KY 41129  
Tel. (606) 739-6774  
Fax (606) 739-9125

A copy of the foregoing Motion for Enlargement of time was sent, postage prepaid to:

Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

This the 19th day of March, 2015.



Kevin P. Sinnette

**CANNONSBURG WATER DISTRICT**

1606 Cannonsburg Road Ashland, KY 41102 (606) 928-9808

CERTIFIED MAIL

March 19, 2015

Mr. Jeff Duren, Executive Director  
KY Public Service Commission  
Office of General Counsel  
211 Sower Blvd.  
Frankfort, KY 40601

RE: Cannonsburg Water District  
Surcharge Spending Plan  
Case No. 2014-00267

Dear Mr. Duren:

This is in accordance with PSC Staff's "Second Request for Information" dated February 6, 2015. Be advised that we did not actually receive a copy until it was faxed to us by our Attorney on March 13, 2015.

Please find enclosed the following info:

*1.a. Provide confirmation the meters have been installed in accordance with the engineered drawings previously submitted to the Commission.*

Yes, the meters were installed 4 months ago in accordance with PSC approvals last October 2014. We previously reported this in our December 29, 2014 letter to the Commission.

*1.b. Provide a detailed explanation of the status of the development of a comprehensive unaccounted water loss reduction plan.*

We began reading the meters daily in December 2014. We noticed within 4-5 weeks, we began recording irregular readings. We discovered by early January 2015 the meter registers had become waterlogged and were unreadable. Upon further investigation, our supplier determined their manufacturer had mistakenly supplied meters with registers that were not fully waterproof.

Our supplier, C.I. Thornburg contacted the meter supplier, Sensus. They investigated the problem and discovered their Krohne Co. mag meters (division of Sensus) as supplied were not fully submerged/waterproof rated for underground service. Sensus is a very respected meter manufacturer (we've used their meters for 40+ years). They are replacing all (10) defective Monitor Meters at no extra cost. They are also removing the faulty, and installing the replacement meters at no added cost.

The scheduled date to have the faulty meters removed and replacement meters installed is late April 2015.

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In summary, due to the defective meters originally provided, we do not have any consistent data to report yet.

***1.c. Provide a detailed explanation describing the type of information that is being collected as described in your response to the Commission.***

Once the replacement meters are received and installed, we will resume our daily readings. Each of the (10) monitor meters will be read daily Monday-Friday. Monday's reading will be recorded but averaged since it will actually be for (3) days. We will need to insure that we can obtain a monthly reading for each Monitor meter zone that corresponds to the monthly individual customer meter reading period.

We have developed tabular forms to record the data. We have driven the areas served by all (10) Monitor meter zones. We have recorded the number of customers in each Meter Zone. Based on the number of customers in that Zone, we have developed a "baseline" daily flow reading that is expected. We also have the ability to break out the total of all the individual customer water meter readings within that Zone

***1.c (1) Provide how this info will being utilized.***

We will compare the baseline daily flow with the actual daily flow as read from each Monitor meter. From that data, we should be able to determine Zone areas that have excessive unaccounted for water usage.

***1.c (2) Provide all work papers and supporting documentation***

As noted above, due to the faulty meters originally installed, we have not been able to collect any substantive data yet. See attached letter from our meter supplier C.I. Thornburg Co.

We have however developed forms for the daily Monitor meter readings. See attached copy of our daily Monitor meter recorded flow reading form that will be used.

***1.d. For each of the Cannonsburg District's master meter zones, provide a monthly comparison of the master meter readings to the customer meter readings for the months of December 2014 and January 2015.***

We will provide the Commission with this info once we begin collecting good information. We estimate the initial (2) months of data to be provided will be June and July 2015.

***2.a Provide an explanation why no activity occurred during the month of December 2014.***

See responses above. Due to the faulty Monitor meters originally installed, we did not have accurate or reliable data to collect.



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***2.b Provide the type of activity intended***

See response to 1.c above. For the month of December 2014, we began collecting daily Monitor master meter readings for each of the (1) Zones. And intended to collect a least (2) good months of data. And comparing that data to "baseline" data for the total individual number of customers in that Zone. But due to the defective meters originally supplied, we were not able to collect even (1) full month of good data.

***2.c/d Provide the definition of the term "phase" as used by Cannonsburg District in the December 2014 Surcharge Report***

We apologize for the confusion here. We do have a completely separate project fully funded by USDA Rural Development. The project involves repainting (2) existing water storage tanks, upgrades to (2) existing booster pump stations, constructing (2) small in-line hydro-pneumatic booster stations to cover areas that have at times report low pressure. Project also includes replacing (2) existing mainline creek crossings that have been chronically leaked in the past, replacing a section of existing 6-inch line from the existing Tarpin Ridge that we have repaired several times in the past. Also we are upgrading our old "drive by" residential water meters with newer "radio read" meters.

***2.e Explain if Cannonsburg District intends to submit an application for Public Convenience for the construction in the next "phase".***

Yes, absolutely. We have Randy Jones- Attorney with Rubin & Hays under contact as our Bond Counsel. Following the opening and approval of the construction bids, Mr. Jones will file a formal application for Convenience and Necessity with the Commission.

Please review this info and contact us with questions.

Sincerely,

CANNONSBURG WATER DISTRICT

Danny Clarkston- General Manager

Cc: Kevin Sinnette- Water District Local Counsel  
Randy Jones- Water District Bond Counsel  
Paul Amburgey, P.E. - Water District Consulting Engineer



# The C.I. Thornburg Co., Inc.

P.O. Box 2163 • Huntington, WV 25722  
4034 Altizer Avenue • Huntington, WV 25705  
(304) 523-3484 • FAX (304) 523-0510

March 16, 2015

Mr. Danny Clarkston  
Cannonsburg Water District  
1606 Cannonsburg Road  
Cannonsburg, KY 41102

Re: Ten (10) 6" Sensus AccuMag Meters

Dear Mr. Clarkston,

This letter will confirm our telephone conversations recently regarding the failure of the referenced meters furnished on Contract 2.

As discussed, these meters were furnished in June of 2014 under Specification IP68, and should be waterproof for typical pit-set installations. Unfortunately, these meters have failed due to water intrusion into the register and flow-tube electronics.

Each of these ten (10) meters will be replaced under warranty, including labor, with replacement meters meeting the exact specifications as developed by your Engineer. However, these replacement meters will truly be waterproof, rated for constant submergence, and suitable for your pit-set installations.

These replacement meters are on order from the manufacturer, and will be promptly installed when received. I will advise the expected date as soon as it is available.

We sincerely apologize for the significant inconvenience this failure has caused in the usage of these meters to assist in reducing your unaccounted for water.

Sincerely,

**The C. I. Thornburg Co., Inc.**

  
Alan S. Morrison, P. E.  
Business Development

*Leading the World Through Clean Water*

Branch Offices: Bowling Green, KY • Bridgeport, WV • Huntington, WV • Nashville, TN  
[www.cithornburg.com](http://www.cithornburg.com)

Cc: Mr. Paul Amburgey, P. E.  
E. L. Robinson Engineering Co.  
3145 Greenup Ave.  
Ashland, KY 41101

MONTH	ZONE 1	USAGE	#161	ZONE 2	USAGE	#207	ZONE 3	USAGE	#133	ZONE 4	USAGE	#358	ZONE 5
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