

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NORTHERN)
KENTUCKY WATER DISTRICT FOR A) CASE NO.
DEVIATION FROM 807 KAR 5:006, SECTION) 2016-00427
26(6)(B))

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO NORTHERN KENTUCKY WATER DISTRICT

Northern Kentucky Water District ("Northern Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due within 14 days of the date of this request. Responses to requests for information in paper medium 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.

Northern Kentucky 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 Northern Kentucky 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 should 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. When filling a paper containing personal information, Northern Kentucky 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 page 6, which requests a deviation to allow Northern Kentucky to inspect approximately 20 percent of its valves on an annual basis and provide the following:

a. State how Northern Kentucky will track information concerning its inspections to ensure that all valves within its system are inspected as often as necessary but not less frequently than once every five years; and

b. State whether it is Northern Kentucky's position that the risks associated with inspecting a one-inch valve no less frequently than once every five years do not differ from the risks associated with inspecting a 42-inch valve no less frequently than once every five years. If it is Northern Kentucky's position that the risks differ, fully explain how they differ and identify all factors which justify utilizing the same

minimum inspection frequency for all valves, regardless of size, within Northern Kentucky's system.

2. Refer to the Application, at page 2, which states that Northern Kentucky "has approximately 22,850 valves in its system, which range in size from 1-inch to 42-inch," and provide the following:

a. A schedule that identifies each class of valve size in Northern Kentucky's system and the corresponding number of valves within each class;

b. State whether Northern Kentucky distinguishes the function of a valve within its system as transmission or distribution infrastructure based upon valve size; and

c. State the smallest size valve class in the Northern Kentucky system that is considered part of the transmission system.

3. State how Northern Kentucky's current system of systematic inspection of its system ensures that Northern Kentucky is conducting inspections of its valves as often as necessary but not less frequently than established in 807 KAR 5:006, Section 26(6)(b).

4. State whether Northern Kentucky will utilize the location of a valve in determining when to inspect the valve. If Northern Kentucky does not plan to utilize location of a valve in determining when to inspect the valve, explain why.

5. Refer to the Application, at page 2, which indicates that Northern Kentucky valves 16-inch and larger are operated every two years and state whether Northern Kentucky will utilize the size of a valve in determining when to inspect the valve. If

Northern Kentucky does not plan to utilize the size of a valve in determining when to inspect the valve, explain why.

6. State how Northern Kentucky detects valve damage short of failure and how Northern Kentucky detects a complete valve failure.

7. State whether Northern Kentucky has a written valve testing/replacement plan, and, if it does, provide a copy of the plan.

8. Refer to the Application, at page 6, which requests a deviation to allow Northern Kentucky to inspect approximately 33 percent of its meters on an annual basis and provide the following:

a. State how Northern Kentucky will track information concerning its inspections to ensure that all meters and meter settings within its system are inspected as often as necessary but not less frequently than once every three years; and

b. State whether it is Northern Kentucky's position that risks associated with inspecting its smallest sized meters no less frequently than once every three years do not differ from the risks associated with inspecting its largest sized meters no less than once every three years. If it is Northern Kentucky's position that the risks differ, fully explain how they differ and identify all factors which justify utilizing the same minimum inspection frequency for all meters and meter settings, regardless of size, within Northern Kentucky's system.

9. State how Northern Kentucky's current system of systematic inspection of its system ensures that Northern Kentucky is conducting inspections of its meters and meter settings as often as necessary but not less frequently than established in 807 KAR 5:006, Section 26(6)(b).

10. Refer to the Application, at pages 3 and 4, and provide the following:
 - a. Northern Kentucky stated that in 2015 it inspected and changed out 8,257 meters. State whether these meters were inspected as part of a routine program of inspection. If the meters were inspected as a part of a routine program of inspection, provide a description of the program. If the meters were not inspected as part of a routine program of inspection, explain why the meters were inspected;
 - b. Explain why it was necessary to change out all 8,257 meters inspected in sub-part a;
 - c. Describe the difference between a customer service inspection request and a billing inspection request, and state the most frequent reasons cited in support of a customer service inspection request;
 - d. State whether Northern Kentucky, on its own initiative, inspects meters or meter settings as a result of billing information irregularities or whether inspections due to billing inspection requests are limited to requests made by a customer (as opposed to a request generated by Northern Kentucky's internal operations); and
 - e. State whether Northern Kentucky manually reads any of the meters in its system, and, if it does conduct manual readings, identify the number of meters manually read and explain why the meters are manually read.

11. Refer to the Application, at page 4, and provide a copy of Northern Kentucky's written meter testing/replacement plan.

12. Refer to the Application, at page 3, which states, in pertinent part, that, as of December 31, 2015, Northern Kentucky "had 83,781 meters and meter settings in

service” and provide a schedule that identifies each class of meter size in Northern Kentucky’s system and the corresponding number of meters within each class.

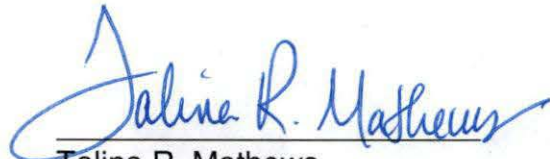
13. Provide the following:

a. State whether Northern Kentucky inspects a meter for unauthorized usage after service to a customer through that meter has been discontinued for nonpayment, and, if it does inspect the meter, describe the inspection process and frequency of inspections;

b. State whether Northern Kentucky inspects a meter for unauthorized usage after service to a customer through that meter has been discontinued for reasons other than nonpayment, and, if it does inspect the meter, describe the inspection process and frequency of inspections;

c. State whether Northern Kentucky inspects meters and meter settings of inactive accounts for evidence of damage or tampering, and, if it does inspect the meter and meter setting, describe the inspection process and frequency of inspections; and

d. State whether Northern Kentucky ever turns off, locks, or pulls a meter when water service to the facility through that meter is discontinued or terminated. If it does, describe the inspection process and frequency of inspections for determining whether the meter remains turned off, locked, or has not been reconnected.



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DATED **MAR 08 2017**

cc: Parties of Record

Case No. 2016-00427

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