

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC GRAVES COUNTY WATER)	
DISTRICT'S UNACCOUNTED-FOR WATER)	CASE NO.
LOSS REDUCTION PLAN, SURCHARGE, AND)	2019-00347
MONITORING)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO GRAVES COUNTY WATER DISTRICT

Graves County Water District (Graves District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on July 18, 2022. The Commission directs Graves District 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 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

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).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Graves District shall make timely amendment to any prior response if Graves District obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Graves District fails or refuses to furnish all or part of the requested information, Graves District 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Graves District 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 Annual Progress Report submitted by Graves District on March 2, 2022 (Annual Progress Report), Table 2 on page 6 and Appendix B. Appendix B states that the total expenditures for the review period were \$233,808.56, and Table 2 states that the total actual expenditures for Year 2 were \$213,952.

- a. Explain and reconcile the difference in total expenditures for the review period as presented in the Annual Progress Report.

b. Provide supporting calculations for all assumptions stated in Appendix B.

2. Refer to the Annual Progress Report, page 9, the paragraph that begins, “Graves District has no explanation. . . .”

a. Provide an update on Graves District’s review of records to determine whether leak repair work was reported as normal maintenance and incorrectly funded through operation and maintenance funds, rather than from surcharge funds.

b. State the measures Graves District has put in place to ensure that leak detection and repair is properly charged to the surcharge account.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED JUN 28 2022

cc: Parties of Record

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