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OCT 07 2013

PUBLIC SERVICE
COMMISSION

Response in the Matter of

Case No 2013-00188

First Request

Garry Wade, District Manager

Sue Carter, Office Manager

Responding

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COMMISSION

I Sue Carter, certify that the questions answered by myself in the response to PSC Case No. 2013-00188 are true and accurate to the best of my knowledge, information and belief.

Sue Carter

Date 10-4-13

I Garry Wade, certify that the questions answered by myself in the response to PSC Case No. 2013-00188 are true and accurate to the best of my knowledge, information and belief.

Garry Wade Date 10-4-13

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RESPONSE OF SUE CARTER TO QUESTION NO. 1

1. DIVISION OF WATER REQUIREMENTS 2014

RESPONSE:

Reduction of Lead in Drinking Water Act

Lead Reduction Act

- Congress passed new legislation lowering the lead content for solder and adding a “wetted” surface requirement (less than 0.25% lead)
 - Effective in 2014
 - May be incorporated into Long Term LCR revisions
 - NSF and other certifying authorities involved
 - This should be forward-moving legislation and will **not** require that all meters, etc in the system be changed
- Systems should have a plan in place in advance for implementing this change



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AWWA Releases Response to New Lead Reduction Act

After a shareholder meeting with the EPA, AWWA releases 10 suggestions on how to best implement a new lead reduction act.

• Sep 06, 2012

During a shareholder meeting on August 16, The U.S. Environment Protections Agency called for members to submit opinions and suggestions that they may have regarding the implementation of the "Reduction of Lead in Drinking Water Act" (Public Law 111-380). This law outlines two basic objectives: lowering the allowable amount of lead in pipes, fittings, and plumbing fixtures coming into contact with water and creating a small number of exemptions to this lead-free definition.

In response to this, the American Water Works Association released a detailed statement of ideas regarding the law and how best to integrate it into the water industry.

In this statement, released August 31, AWWA outlined ten recommendations about moving forward toward clean water. Calling for a simple and direct execution of this act, AWWA's suggestions ranged from focusing on those two objectives to shying away from elaborate implementations of this act.

"It is essential that the Agency facilitate timely implementation of Public Law 111-380 and not introduce additional uncertainty or complicate work that is already underway to achieve compliance with the law's intent," said Thomas Curtis, AWWA's deputy executive director, in a letter accompanying the suggestions.

For the full list, visit the AWWA website.

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Leading the Way Without Lead

By Laura Williams Jun 14, 2011

Meter madness has taken effect at AWWA's Annual Convention and Expo. "Smart" meters that monitor usage at high resolution and are programmed to send a signal to utilities in the event of unusual water usage (which typically indicates leaks) are all over the showroom floor, and the capabilities they bring to water use analysis are far-reaching.

In addition to the smart meter refrain, there is a chorus of "no lead, no moving parts at the expo. It seems companies in every corner are trying to get ahead of the provisions of the Reduction of Lead in Drinking Water Act that take effect in the early days of 2014. The law will prohibit the use of any lead in surfaces that touch drinking water, including the ubiquitous brass.

Foundries incorporate lead in brass fixtures because the element makes it easier for foundries to machine parts, according to Michael Rothberg, territory manager at A.Y. McDonald Manufacturing Company, which manufactures a variety of brass waterworks products.

Meter manufacturers in particular are taking diverging paths in the face of this regulatory requirement to forego lead.

Some, such as Sensus and Elster, are largely abandoning brass, opting instead for a composite or stainless steel construction for the meter. Through the efforts of materials engineering, some polymer composites can bear up to twice the pressure brass can. However, Rothberg said that polymer and stainless constructions are not as versatile as brass, in that they cannot be formed into as many types of fittings.

McDonald and other companies with a history in foundering the alloy are sticking with brass and substituting bismuth, an element commonly used in cosmetics, medicines, and medical procedures, for the lead. Rothberg said that the switch in material will change the properties of the brass, making the machining process a bit more difficult. Nonetheless, he said that orders for no-lead brass are up, and his company is pouring the material twice a month.

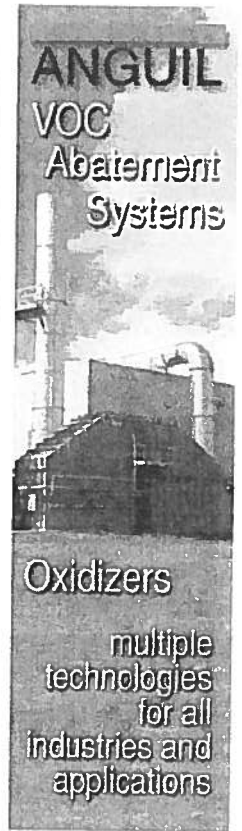
And then there's a hybrid solution: A composite interior with lead-containing brass threads fitted on top. Thomas Gwynn, president of Elster Water Inc., explained that his company decided to go this route to help ease the transition from brass to polymer, as well as to reduce the risk of stripped or crossed threads, a phenomenon associated with plastic threading.

Mike Tracy of Sensus, which sticks to 100-percent composite meters in its Aqualstream system, was somewhat skeptical that the combination of materials would work well. "I think it's all about fashion, to be honest," he said. "What concerns me is that you're sticking these meters outside, in the ground sometimes, and the composite and the metal will expand and contract at different rates."

About the Author

Laura Williams is a content editor for Environmental Protection. She can be reached at LauraWilliams@1105media.com

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Reduction of Lead in Drinking Water Act

The Reduction of Lead in Drinking Water Act was signed into law by the President of the United States on January 4, 2011. The new law takes effect on January 4, 2014. This new law is having a profound impact on the use of waterworks brass in the drinking water industry.

This amendment to the Clean Drinking Water Act will reduce the allowable lead content in any brass products that touch the wetted surfaces in potable drinking water systems. The reduction in lead content is very dramatic, from levels as high as 8 percent down to 0.25 percent.

Team E.J. Prescott, a leading supplier of waterworks brass products, stands ready to help you put a plan in place to go lead free well in advance of the 2014 deadline. Company leadership has established an April 2, 2012 deadline for its compliance with this new law.

Solid planning will help assure a smooth transition!

[Download our brochure](#) or give us a call at 1-800-356-8605 for more information or to place an order.

Time is running out! Be ready with EJ Prescott products:

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RESPONSE OF GARRY WADE TO QUESTION NO. 2

2. INVOICE FOR METER PURCHASE NOVEMBER 2012

RESPONSE:

Invoice for meter purchase in November 2012 is included along with an invoice for meter purchase in June 2013, to show the difference in cost of meters to meters meet the lead reduction act.

9

INVOICE



WATER, SEWER & GAS DIVISION
SIGNS & SAFETY DIVISION
FIRE, RESCUE AND SAFETY EQUIPMENT
 P.O. Drawer 459—1105 Hwy 77
 Atwood, TN 38220
 (731)662-7193 or (800)238-3836
 Fax: (731)662-7219

INVOICE	
6483999	
Invoice Date	Page
11/29/2012 11:49:28	1 of 1
ORDER NUMBER	
1500826	

Bill To:

ALLEN COUNTY WATER DISTRICT
 P.O. BOX 58
 SCOTTSVILLE, KY 42164

Ship To:

ALLEN COUNTY WATER DISTRICT
 109 PLUM STREET
 SCOTTSVILLE, KY 42164

Customer ID: 5933

PO Number	Term Description	Net Due Date	Disc Due Date	Discount Amount
	Net 30	12/29/2012	12/29/2012	0.00

Order Date	Pick Ticket No	Primary Salesrep Name	Taker
11/26/2012 12:31:18	3504464	Jeff Wallace	NBRYANT

Quantities			Status Key	Item ID	Unit	Unit Price	Extended Price
Ordered	Shipped	Remaining	B = Backorder D = Direct C = Canceled P = In Production	Item Description			

Delivery Instructions: CALL DAY BEFORE DELIVERY MUST HAVE TEST RESULTS

Carrier: OUR TRUCK

Tracking #:

200	200	0		C7BPUPP-0607 5/8X3/4 AMCO WATER METER - US GAL POLY TOP- POLY BTM SERIAL # _____	EA	31.5000	6,300.00
-----	-----	---	--	---	----	---------	----------

Total Lines: 1

SUB-TOTAL: 6,300.00

TAX: 0.00

AMOUNT DUE: 6,300.00

Thank You!! We Really Appreciate Your Business! FED. I. D. 620912993

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Received
 DEC - 3 2012

All returns may be subject to a manufacturers re -stocking charge. All custom or non-stock items are non-returnable.

INVOICE



SUPPLY CO., Inc.

WATER SEWER & GAS DIVISION
SIGNS & SAFETY DIVISION

P.O. Drawer 459—1105 Hwy 77
Atwood, TN 38220
(731)862-7193 or (800)238-3836
Fax: (731)862-7219

INVOICE	
6507939	
Invoice Date	Page
7/30/2013 09:24:40	1 of 1
ORDER NUMBER	
1522223	

Bill To:

ALLEN COUNTY WATER DISTRICT
P.O. BOX 58
SCOTTSVILLE, KY 42164

Ship To:

ALLEN COUNTY WATER DISTRICT
109 PLUM STREET
SCOTTSVILLE, KY 42164

Customer ID: 5933

PO Number	Term Description	Net Due Date	Disc Due Date	Discount Amount
0487	Net 30	8/29/2013	8/29/2013	0.00

Order Date	Pick Ticket No	Primary Salesrep Name	Taker
6/18/2013 07:59:04	3529522	Jeff Wallace	NBRYANT

Quantities			Status Key	Item ID	Unit	Unit Price	Extended Price
Ordered	Shipped	Remaining	B = Backorder D = Direct C = Canceled P = In Production	Item Description			

Delivery Instructions: CALL DAY BEFORE DELIVERY

Carrier: OUR TRUCK

Tracking #:

180	90	90	B	PMN02US-PP-0607	EA	38.5000	3,465.00
5/8 X 3/4 ZENNER MULTI-JET METER - USG							
POLY TOP, POLY BOTTOM SERIAL#							

Total Lines: 1

SUB-TOTAL: 3,465.00

TAX: 0.00

AMOUNT DUE: 3,465.00

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Allen Co. W.

AUG -

RE

RESPONSE OF GARRY WADE TO QUESTION NO. 3

3. BIDS FROM CONSOLIDATED PIPE & SUPPLY

RESPONSE:

The quotation from Consolidated Pipe and Supply is included, along with the quotation from G & C Supply to show both companies charge the same price for the meters.

(5)

CONSOLIDATED PIPE AND SUPPLY CO., INC.
CUSTOMER QUOTE

768 INTERSTATE DRIVE
BOWLING GREEN KY 42101

Quote Nbr: 097992 000
Quote Date: 2/21/2013

Page 1

0023 - MARK RIVERS
MAIN 270-393-8311
FAX 270-393-8451

Job: HERSEY/MUELLER SYSTEMS METER
QUOTE

Engineer: N/A
Bid Date: 2/21/2013

Quote

383616 - ALLEN COUNTY WATER
DISTRICT
P O BOX 58
SCOTTSVILLE KY 42164 0058

Good Until: 6/30/2013

Line	Qty	Item	Size/Wall/Description	Price	Extended Price
1	2.0	2 MUELLER MVR DIRECT READ MTR		535.00 EA	1,070.00
		**OR:			
3	2.0	2 MUELLER 572 DI POSITIVE DISPLACEMENT METER		500.00 EA	1,000.00
4	3.0	205338 1 HERSEY 452IIS P/L CIB USG MTR		154.00 EA	462.00
5	195.0	252641 5/8X3/4 HERSEY 420 SG CB COMPOSITE BODY		38.50 EA	7,507.50

No Seal

Terms: NET 30 DAYS

Thank you for the opportunity to quote on your requirements.
If we can be of further assistance, please do not hesitate
to call.

Shipment: FOB Ship Point with full freight allowed

PLEASE CALL WITH ANY QUESTION.

THANKS,
MARK RIVERS

OFFICE #270-393-8311
CELL #270-392-8338
FAX #270-393-8451
E-FAX #205-488-9459
EMAIL: MRIVERS@CONSOLIDATEDPIPE.COM
WWW.CONSOLIDATEDPIPE.COM

& C SUPPLY CO., Inc.
 1617 E. ZENNER & GAS DR. 150' W.
 SCOTTSVILLE, KY 42164
 P.O. Drawer 458--1105 Hwy 77
 Atwood, TN 38220
 (731)662-7182 or (800)238-4836
 Fax: (731)662-7219

QUOTATION

Order Number	
1515744	
Order Date	Page
4/18/2013 08:04:53	1 of 1

Bill To:
 ALLEN COUNTY WATER DISTRICT
 P.O. BOX 58
 SCOTTSVILLE, KY 42164

Ship To:
 ALLEN COUNTY WATER DISTRICT
 109 PLUM STREET
 SCOTTSVILLE, KY 42164

(270) 622-3040

Customer ID: 5933

PO Number	Ship Route	Taker
	UTLY	NBRYANT

Quantities		Status Key	Item ID Item Description	Unit Size	Unit Price	Extended Price
Ordered	Remaining	Status of Balance				

Delivery Instructions: CALL DAY BEFORE DELIVERY

6	6		PMN02US-PP-0607 5/8 X 3/4 ZENNER MULTI-JET METER - USG POLY TOP, POLY BOTTOM SERIAL#	EA	38.5000	231.00
6	6		PPD02US-PP-0607 5/8X3/4 ZENNER WATER METER - US GAL POLY TOP, POLY BOTTOM SERIAL#	EA	39.2500	235.50

*No Lead
Quote*

Total Lines: 2

SUB-TOTAL: 466.50
TAX: 0.00
AMOUNT DUE: 466.50

RESPONSE OF GARRY WADE TO QUESTION NO. 4

4. ADVERTISEMENT FOR BIDS FOR 20 OR 30 METERS

We do not advertise in the local paper because there are not any supply companies closer than Bowling Green. Our local paper publishes once a week and only in Allen County.

We call several suppliers and get quotes to get the best price.

RESPONSE OF GARRY WADE TO QUESTION NO. 5

5. A. FARTHEST DISTANCE FROM SHOP

B. BASE MILEAGE

RESPONSE TO QUESTION NO. 5---A. AND B.

The distance from the shop to the end of service area is approximately 25 miles in most instances. It is further in other instances. The reason we used 25 miles is because we don't just go straight to the end of a service area, we may go 10 miles out and have to turn down another road and go another 10 to 12 miles and turn down another road and go further. Allen County is a farming county and there is some distance between houses and properties.

Also, when we set services, we don't always just set one service. We may set one on the east side of the county and then have to travel to the west end of the county, which would be about 40 miles or more there before we bring the equipment back to the shop.

Sometimes it may take an average of 32.5 miles or more, so we just used the end of our service area for the distance and the travel time of 25 miles.

This is answering both a. and b. parts to this question.

RESPONSE OF GARRY WADE TO QUESTION NO. 6

6. A. INSTALLATION LABOR EXPENSE

B. CLERICAL AND OFFICE LABOR EXPENSE

RESPONSE:

a. We based installation labor cost on the oldest employee because he is the only one that does that particular job on a daily basis. His rate of pay was at that time, \$18.06, so we rounded down to \$18.00.

Our employees got a raise in July, that brings our oldest employees to \$18.60 per hour. If we take the four highest wage rates and average them, we get \$17.92 an hour, rounding up to \$18.00

b. All the office employees, except for the manager, do the same job. Field employees are not necessarily doing the same job daily.

RESPONSE OF GARRY WADE TO QUESTION NO. 7

7. METER CONNECTION/RECONNECT

RESPONSE:

The distance from the shop to the end of service area is approximately 25 miles in most instances. It is further in other instances. The reason we used 25 miles is because we don't just go straight to the end of a service area, we may go 10 miles out and have to turn down another road and go another 10 to 12 miles and turn down another road and go further. Allen County is a farming county and there is some distance between houses and properties.

We send our people out with several work orders at the same time. One may be on the east side of the county and then have to travel to the west end of the county to do another reconnect or connection, which would be about 40 miles or more there before they return to the shop.

Sometimes it may take an average of 32.5 miles or more, so we just used the end of our service area for the distance and the travel time of 25 miles.

RESPONSE OF SUE CARTER TO QUESTION NO. 8

8. PERCENT OF WAGE CONTRIBUTIONS

RESPONSE:

- A. 100 % of wages for Social Security**
- B. 100% of wages for Medicare**
- C. 100% of wages for Defined benefit pension plan**

RESPONSE OF SUE CARTER TO QUESTION NO. 9

9. INSURANCE COVERAGE

RESPONSE:

Allen County Water District provides life insurance, health insurance and dental insurance for all employees.

Allen County Water District pays 100% of the cost of insurance coverage provided to employees.

RESPONSE OF GARRY WADE TO QUESTION NO. 10

10. INSTALLATION EQUIPMENT EXPENSE JUSTIFICATION

RESPONSE:

- a. The rate of \$75.00 was determined because of the rate of Backhoe hiring in this area. To pay get backhoe work done in this Area is estimated to be \$150. an hour in this county.

Not to overly charge our customers, we determined that half of that cost would be fair.

- b. As Allen County Water District owns all equipment to install a meter service, we provide the fuel cost, insurance cost, and maintenance to keep the equipment running and up to date.

Fuel cost running anywhere from \$3.99.9 to over \$4.25.9 per gallon, cost of tires being approximately \$1600. plus for a set of 4 for the backhoes, and keeping the other equipment running and maintained on daily basis.

RESPONSE OF GARRY WADE TO NO. 11

11. OVERTIME PAY TO EMPLOYEES DUE TO SERVICES NEEDED

RESPONSE:

Reconnections and service calls are required after normal working hours at different times in order to keep our customers in water without interruption or check out a problem someone has called in to have checked or to reconnect a service that has been disconnected due to nonpayment.

RESPONSE OF GARRY WADE TO NO. 12

12. COST OF 1 INCH AND LARGER METER CONNECTIONS

RESPONSE:

Tariffs were set at the price we charge for 1 inch and 2 inch meter services in 1990 and have not been changed since that time.

Some meter services 1" and 2" take longer to set than others due to rock, boring under roads or cutting roads. We have actually set meter services of this size in the past that have taken over a day to drill through the rock to cross the road to set the meter.

We based the flat rate on the actual time it takes to set an average meter service of 1" or larger. Some customers would be paying a lot more for a meter service than others due to the longer time and extra materials it would take to set them.

If we charged by actual cost of installing a 1" or larger meter service, the cost would be different to different customers and we feel that the average cost of this type of meter service is a fair way to charge for 1" and larger. If a meter service takes longer than it normally does, we do not charge the customer any more than the average cost.