

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
HARDIN COUNTY WATER DISTRICT	)	
NO. 2 FOR A DECLARATORY ORDER	)	
THAT SAMPLE TESTING	)	
SATISFIES THE TESTING	)	CASE NO. 2016-00432
REQUIREMENTS OF 807 KAR	)	
5:066 SECTION 16(1) OR, IN THE	)	
ALTERNATIVE, FOR AN ORDER	)	
GRANTING A DEVIATION FROM	)	
807 KAR 5:066 SECTION 16(1)	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO  
HARDIN COUNTY WATER DISTRICT NO. 2

Hardin County Water District No. 2 ("Hardin No. 2"), pursuant to 807 KAR 5:001, is to file with the Commission the original with ten copies in paper medium and an electronic version of the following information. The information requested herein is due within ten 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 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.

Hardin No. 2 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 Hardin No. 2 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. When filing a paper containing personal information, Hardin No. 2 shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide the current number of Hardin No. 2's active accounts.
2. Refer to Hardin No. 2's application, which states that Hardin No. 2 is current with its replacement program. State whether Hardin No. 2 has any water meters in service that are older than those replaced in 2006.
3. Refer to the application, which states that Hardin No. 2 adopted its Sample Meter Testing Plan in 2016. State whether in 2016 only a sample test of all meters reaching ten years of service in that year was tested, or if all meters reaching ten years of service in that year were tested.

4. Explain how the Sample Meter Testing Plan provides for a random sampling process. Will a random selection be made for each year of service being tested, or does Hardin No. 2 plan to randomly select a group at ten years of service, and re-test those same meters for years 11–15?

5. Explain Hardin No. 2's claim that there is an asymmetry or variability using the ANSI Standard to measure low flow readings and recommend any other available ANSI standards that could account for the variability as opposed to utilizing the means analysis.

6. During the April 13, 2017 Informal Conference ("IC"), Hardin No. 2 representatives stated that an estimate of the soft cost savings associated with sample testing of meters could be provided.

a. Provide an estimate of the soft cost savings.

b. Provide a detailed explanation of all benefits Hardin No. 2 will experience due to the proposed sample meter testing.

7. Refer to Hardin No. 2's Response to Staff's First Request for Information ("Staff's First Request"), Item 1. Hardin No. 2 states that all meters installed from 2006–2011 are Sensus SR Series Meters, consisting of 15,589 Sensus SR Series; 10,607 Sensus Accustream; and 169 Sensus iPERL meters.

a. Explain how all three types of meters being used are comparable to the Sensus SR meters that were studied in the cases cited in comparison by Hardin No. 2 in its application.

b. Explain whether Hardin No. 2 will be using the same make and models of meters moving forward, and if not, how and why other makes or models of meters would be considered comparable to those previously studied.

8. Refer to Hardin No. 2's response to Staff's First Request, Item 1, which states that 555 meters reached the threshold of ten years of age in 2016. Generally, the number of meters that will reach the ten-year age threshold will increase annually through the year 2026, when 5,890 meters would be replaced. If the Commission were to deny the proposed deviation to allow sample testing of meters, provide a comparison of Hardin No. 2's current staff level to the level of staff Hardin No. 2 will need to remain current with its meter replacement program in 2026.

9. During the IC, Hardin No. 2 representatives stated that 555 meters were installed in 2006. Following the proposed Sample Meter Testing Plan, Hardin No. 2 tested 35 meters in 2016 from this group. Provide detailed estimate of costs incurred to test the 35 meters.

10. During the IC, Hardin No. 2 representatives stated that the system's line loss had increased in 2015 due to the acquisition of the city of Elizabethtown's ("Elizabethtown") system.

- a. Describe the condition of Elizabethtown's system when acquired.
- b. Provide a detailed description of Hardin No. 2's efforts to reduce line

loss.



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DATED MAY 11 2017

cc: Parties of Record

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