

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
CANNONSBURG WATER DISTRICT FOR AN)	
ORDER AUTHORIZING THE ISSUANCE OF)	
INDEBTEDNESS AND FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	
INSTALL A ZONE METERING SYSTEM)	CASE NO.
IMPROVEMENT AND OTHER SYSTEM)	2020-00118
IMPROVEMENTS, AUTHORIZATION TO)	
EXECUTE AN ASSISTANCE AGREEMENT)	
WITH THE KENTUCKY INFRASTRUCTURE)	
AUTHORITY AND AUTHORIZATION TO)	
DISBURSE SURCHARGE PROCEEDS)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO CANNONSBURG WATER DISTRICT

Cannonsburg Water District (Cannonsburg District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on May 20, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Cannonsburg District SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

Cannonsburg District shall make timely amendment to any prior response if Cannonsburg District 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 Cannonsburg District fails or refuses to furnish all or part of the requested information, Cannonsburg 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, Cannonsburg 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 application, Exhibit 19.

a. Provide the total number of employees engaged in monthly meter reading for Cannonsburg District.

b. Provide the other duties these employees perform when not reading customers' meters.

c. Explain whether reduced maintenance cost on the vehicle(s) is included in the estimation of the savings in this Exhibit.

d. Explain whether there are any additional savings that may be realized through this project that have not been discussed in the application.

2. Refer to page 8 of the application at which Cannonsburg District explains that Phase II of its system improvement project will include the systematic replacement of the polybutylene (BlueMax) service lines, which are particularly susceptible to pinhole leaks and cracking.

a. Provide the total number of service lines in Cannonsburg District's system, and specify how many of those lines are BlueMax.

b. Provide an itemized cost estimate for Phase II of Cannonsburg District's system improvement project.

c. Estimate the impact the replacement of the BlueMax service lines will have on Cannonsburg District's water loss.

3. Confirm that the Phase II Project will not be constructed until the Phase I Project is completed and that the KIA four-year loan has been retired.

4. If confirmed, provide a detailed explanation of why Cannonsburg District is postponing construction of its Phase II Project given that it has been approximately eight

years since the Commission first authorized a water loss surcharge² and the average annual water loss since that time is 28.29 percent.



Kent A. Chandler
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED MAY 11 2020

cc: Parties of Record

² Case No. 2011-00217, *Application of Cannonsburg Water District for (1) Approval of Emergency Rate Relief and (2) Approval of the Increase in Nonrecurring Charges* (Ky. PSC June 4, 2012).

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