

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF WESTERN)	
PULASKI COUNTY WATER DISTRICT FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE)	CASE NO.
AND NECESSITY TO CONSTRUCT A WATER)	2020-00119
IMPROVEMENTS PROJECT PURSUANT TO)	
KRS 278.020 AND KAR 5:001)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO WESTERN PULASKI COUNTY WATER DISTRICT

Western Pulaski County Water District (Western Pulaski 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 12, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Western Pulaski 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.

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

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.

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.

Western Pulaski District shall make timely amendment to any prior response if Western Pulaski 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 Western Pulaski District fails or refuses to furnish all or part of the requested information, Western Pulaski 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 Western Pulaski 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. Provide Western Pulaski District's quarterly meter testing results for calendar years 2018, 2019, and for the first quarter of 2020.
2. Provide Western Pulaski District's results of its three most recent master meter testings.

3. Explain how Western Pulaski District coordinates with the city of Somerset to ensure master meters are tested according to 807 KAR 5:066, Section 16(1).

4. Since Case No. 2017-00063,² Western Pulaski District's water loss has increased from 21.67 percent to 29.99 percent as reported in its 2018 Annual Report.

a. Provide Western Pulaski District's plan for addressing its excessive water loss.

b. If Western Pulaski District has not adopted a plan to address water loss, explain why a plan has not been adopted.

c. Given the increase in Western Pulaski District's water loss, explain why Western Pulaski District eliminated the following items from its originally proposed Phase II project: replacement of dilapidated and undersized water lines; installation of 100 radio read meters; and replacement of service lines.

5. Provide copies of the minutes of the Western Pulaski District's Board of Commissioners meetings at which the proposed Phase II project was discussed.

6. Explain whether Western Pulaski District requested and received bids for its Phase II project as originally proposed in Case No. 2017-00063.

a. If Western Pulaski District received bids for the originally proposed project, provide copies of the bids it received.

b. If Western Pulaski District did not requested bids, provide a detailed explanation as to why bids were not requested.

² Case No. 2017-00063, *Application of Western Pulaski County Water District for the Issuance of a Certificate of Public Convenience and Necessity to Construct a Water Improvements Project and Authorizing the Issuance of Securities for the Purpose of Financing Said Project Pursuant to the Provisions of KRS 278.300 and 807 KAR 5:001* (Ky. PSC April 6, 2017).

7. For each item listed below that was eliminated from Western Pulaski District's originally proposed Phase II project, provide the estimated construction cost, the estimated impact on water loss, and the future construction plans:

- a. Replacement of dilapidated and undersized water lines;
- b. Installation of 100 radio read meters; and
- c. Replacement of service lines.

8. Provide the number of meters Western Pulaski District has in service that are over ten years old and have not been tested as required by 807 KAR 5:066, Section 16(1).

9. If Western Pulaski District has adopted a meter replacement program, provide a copy of the program and the records of meter replacement. If a program has not been adopted, explain why.



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

DATED APR 21 2020

cc: Parties of Record

*Deron S Byrne, P.E.
Monarch Engineering, Inc.
556 Carlton Drive
Lawrenceburg, KENTUCKY 40342

*Tammy Vaught
Office Manager
Western Pulaski County Water District
2128 West Highway 80
Somerset, KY 42503

*Western Pulaski County Water District
2128 West Highway 80
Somerset, KY 42503

*Honorable W. Randall Jones
Attorney at Law
Rubin & Hays
Kentucky Home Trust Building
450 South Third Street
Louisville, KENTUCKY 40202