

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF SOUTH)	
EASTERN WATER ASSOCIATION, INC. FOR)	
COMMISSION APPROVAL PURSUANT TO 807)	
KAR 5:001 AND KRS 278.020 FOR A)	CASE NO.
CERTIFICATE OF PUBLIC CONVENIENCE)	2021-00222
AND NECESSITY TO DEPLOY AN ADVANCED)	
METERING INFRASTRUCTURE (AMI))	
SYSTEM)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO SOUTH EASTERN WATER ASSOCIATION, INC.

South Eastern Water Association, Inc. (South Eastern Water), 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 August 5, 2021. The Commission directs South Eastern Water 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 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

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).

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

South Eastern Water shall make timely amendment to any prior response if South Eastern Water 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 South Eastern Water fails or refuses to furnish all or part of the requested information, South Eastern Water 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, South Eastern Water 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 a detailed list of all alternative meters and meter projects South Eastern Water considered instead of the AMI System Project proposed in this matter.
 - a. Provide a comparison of the costs associated with the alternative projects compared with the costs of the AMI System Project.
 - b. Describe in detail South Eastern Water's reasoning for selecting the AMI System Project instead of alternative projects.

- c. Provide a detailed description of the cost of repairs associated with South Eastern Water's current meters.
 - d. Confirm whether South Eastern Water anticipates repair costs to increase over time.
 - e. Provide a comparison of repair costs associated with existing meters compared to repair costs associated with AMI System Project meters.
2. Confirm whether the funds saved from no longer utilizing a third-party meter reading service are net or gross savings. If gross, detail the costs expended to ascertain those savings.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED JUL 26 2021

cc: Parties of Record

Case No. 2021-00222

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