

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC SOUTHERN WATER & SEWER)	CASE NO.
DISTRICT METER REPLACEMENT)	2020-00121
SURCHARGE MONITORING)	

COMMISSION STAFF'S ELEVENTH REQUEST FOR INFORMATION
TO SOUTHERN WATER AND SEWER DISTRICT

Southern Water and Sewer District (Southern District), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due on May 18, 2023. The Commission directs Southern District 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 question to which the response is made and 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

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).

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

Southern District shall make timely amendment to any prior response if Southern District obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Southern District fails or refuses to furnish all or part of the requested information, Southern 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 and scanned 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, Southern District shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Annual Progress Report filed on April 10, 2023, unnumbered page 6 of 15.

- a. Explain the analysis charge fees charged by People Bank. Include in your response the first date this fee was charged, the reason the bank gives for charging the fee, the total amount charged in the April 2022 through March 31, 2023

reporting period, and any other information available to explain why this fee was incurred and what Southern District is doing to avoid excessive fees.

b. Explain the service charge fees charged by Peoples Bank during the reporting period April 2022 through March 31, 2023; state whether these fees have increased during this reporting period.

2. Refer to the Annual Progress Report filed on April 10, 2023, unnumbered page 7 of 15.

a. Explain what a “sizable portion” means in this context, and state how many RG3 AMR meters Southern District has discovered are zero read.

b. Provide Southern District’s cost to ship malfunctioning meters to the manufacturer during the April 2022 through March 31, 2023 reporting period.

c. Provide an estimate of the cost to ship any remaining malfunctioning meters.

d. Provide justification for the statement that it is Southern District’s responsibility to incur shipping costs to send malfunctioning meters to the manufacturer for repair during the warranty period and include an explanation about why this is not the manufacturer’s responsibility if the problem is due to a “bad run of solders” on batteries.

3. Refer to the Annual Progress Report filed on April 10, 2023, at unnumbered page 8 of 15

a. Provide the number of cases of water theft reported to local county attorneys for prosecution this reporting period.

b. For each case of reported water theft, state the result of the report to the county attorney; include in your response a statement clarifying whether anyone was prosecuted in each instance.

c. Identify locations in Southern District's system that Southern District has identified as sources of unaccounted-for water loss.

d. For each location provided above, state whether Southern District has developed a plan to address the problem, and if so provide a description of the plan.

4. Refer to the Annual Progress Report filed on April 10, 2023, at unnumbered page 14 of 15.

a. Confirm that a total of four out of the proposed ten master meters have been installed.

b. Explain why three of the master meters are installed, but are not operational

c. Provide the date Southern District expects these three master meters to become operational.

d. State whether Southern District will incur any additional expense in making these three master meters operational.

e. State whether the one installed and operational master meter has provided Southern with any useful data in locating leaks to the system.

5. Provide "Appendix to an Order of the Kentucky Public Service Commission in Case No. 2020-00121" for the September 2022 reporting period.

6. Provide the following information in Excel format with all formulas, rows, and columns fully accessible and unprotected.

*Jeff Prater
Chairman
Southern Water & Sewer District
245 Kentucky Route 680
P. O. Box 610
McDowell, KY 41647

*Southern Water & Sewer District
245 Kentucky Route 680
P. O. Box 610
McDowell, KY 41647

*Randy Conley
UMG Project Manager
Southern Water & Sewer District
245 Kentucky Route 680
P. O. Box 610
McDowell, KY 41647

*Steven P. Bailey
Attorney
Bailey Law Office, P.S.C.
181 East Court Street
Prestonsburg, KENTUCKY 41653