

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF WEST	)	
DAVISS COUNTY WATER DISTRICT FOR A	)	CASE NO.
DEVIATION FROM METER TESTING	)	2020-00137
REQUIREMENTS	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO WEST DAVIESS COUNTY WATER DISTRICT

West Daviess County Water District (West Daviess 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 July 24, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,<sup>1</sup> issued March 16, 2020, and March 24, 2020, West Daviess 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 association or a governmental agency, be accompanied by a signed certification of the

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<sup>1</sup> 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.

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.

West Daviess District shall make timely amendment to any prior response if West Daviess 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 West Daviess District fails or refuses to furnish all or part of the requested information, West Daviess 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, West Daviess 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. Identify the number of complaints West Daviess District has received in each of the last five calendar years and so far in the current year regarding meters over- or under-registering flow, and identify the number of those complaints in which West Daviess District has determined that the meters were over- or under-registering flow.

2. Refer to the application, Item 13(d). Provide an explanation, including a list of options, of what West Daviess District will do with the 15-year-old meters when removed from service.

3. Refer to the application, Exhibit 3.

a. Provide the AWWA New Meter Accuracy Standards to which West Daviess District's meters are warranted for five years from the date of shipment or the registration of 500,000 gallons, whichever comes first.

b. Provide the AWWA Repaired Meter Accuracy Standards to which Daviess District's meters are warranted for fifteen years from the date of shipment or the registration of 1,500,000 gallons, whichever comes first.

c. Provide any other information West Daviess District maintains supports its contention that its 5/8- x 3/4-inch Sensus SR11 meters will remain accurate for 15 years.

4. Explain how the manufacturer's warranty of AWWA Repaired Meter Accuracy Standards for 15 years or the registration of 1,500,000 gallons supports a finding that West Daviess District's 5/8- x 3/4-inch Sensus SR11 meters will meet the accuracy requirements of 807 KAR 5:066, Section 15, for 15 years of service.

5. Provide a breakdown by year of when all 5/8- x 3/4-inch Sensus SR11 meters in West Daviess District's system were first placed in service, e.g., the number that was first placed in service in 2010, 2011, etc.

6. Provide a list containing the make model and age of all of West Daviess District 5/8- x 3/4-inch meters that are not Sensus SR11 meters.

7. State what percentage of West Daviess District's total meters are 5/8- x 3/4-inch Sensus SRII meters.
8. Identify who prepared West Daviess District's sample plan.
9. State whether West Daviess District received any opinions from an engineer, statistician, or another person with relevant scientific or technical knowledge of sample testing practices regarding whether West Daviess District's sample testing plan will reliably reflect the accuracy of its 5/8- x 3/4-inch Sensus SRII meters as a whole. If so, provide the following information:
  - a. The name of each person who rendered such an opinion;
  - b. The education, experience, and qualifications of each such person;
  - c. The opinion of each such person regarding whether West Daviess District's sample testing plan will reliably reflect the accuracy of its 5/8- x 3/4-inch Sensus SRII meters as a whole; and
  - d. The basis for each such person's opinion.
10. Refer to the application, Exhibit 1, Section 3.0.
  - a. Confirm that once a sample of meters installed in a given year is selected for testing that the same sample of meters will be tested in subsequent years until the meters in the sample have been in service for 15 years.
  - b. Explain how West Daviess District proposes to identify meters that have been vandalized or tampered with.
  - c. Explain how West Daviess District proposes to identify meters that have suffered a mechanical or other failure that is not equally likely to occur at the same or similar rate in the whole lot.

d. State whether the ANSI Standard West Daviess District proposes to use in its sampling procedures anticipates sample testing the same lot multiple times over several years.

e. If the ANSI Standard West Daviess District proposes to use in its sampling procedures does not anticipate sample testing the same lot multiple times over several years, explain how use of that standard in sample testing the same lot multiple times over several years will produce results that will reliably reflect the accuracy of West Daviess District's meters over time.

f. State whether West Daviess District would incur any additional cost if it conducted a minimum flow rate test on every meter on which it conducted the maximum and intermediate flow rate tests and if so, quantify the additional cost.

g. Explain whether the ANSI Standard anticipates increasing the level of scrutiny for subsequent lots if previous lots performed poorly, and if so, explain why West Daviess District's sample testing plan does not require similar increased scrutiny.

h. Explain the basis for West Daviess District's contention that an AQL of 2.5 for maximum and intermediate flow rated is appropriate, other than the fact that it was used in another case.

i. Explain the basis for West Daviess District's contention that an AQL of 2.5 for maximum and intermediate flow rates would provide reliable results.

j. Explain the basis for West Daviess District's contention that an AQL of 10.0 for minimum flow rates is appropriate, other than the fact it was used in another case.

k. Explain the basis for West Daviess District's contention that an AQL of 10.0 for minimum flow rates would provide reliable results.



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Kent A. Chandler  
Acting Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED   JUL 09 2020  

cc: Parties of Record

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