

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF SOUTHEAST)	
DAVIESS COUNTY WATER DISTRICT FOR A)	CASE NO.
DEVIATION FROM METER TESTING)	2020-00138
REQUIREMENTS)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO SOUTHEAST DAVIESS COUNTY WATER DISTRICT

Southeast Daviess County Water District (Southeast 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 August 28, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Southeast 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

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.

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.

Southeast Daviess District shall make timely amendment to any prior response if Southeast 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 Southeast Daviess District fails or refuses to furnish all or part of the requested information, Southeast 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, Southeast 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. Refer to Southeast Daviess District response to Commission Staff's First Request for Information (Staff's First Request), Item 2.
 - a. Provide the date Southeast Daviess District would consider requesting further extensions of the meters' service life from the Commission.
 - b. Provide a list of vendors that might have a trade-in program and any details of the potential program.

- c. Provide the estimated salvage value for meters sold as scrap.
- d. Provide an explanation of the process required to recycle the meters and place them back in to service. Include the estimated cost that this process will incur.
- e. Provide the estimated cost of replacing the meters once they have been in service for 15 years for each sample group, by year. Include an explanation of how Southeast Daviess District would fund the replacement of meters.

2. Refer to Southeast Daviess District response to Staff's First Request, Item 4. Confirm that in order for Southeast Daviess District to benefit from the 15-year manufacturer's warranty, the individual meter would have to be tested and confirmed inaccurate.

3. Refer to Southeast Daviess District response to Staff's First Request, Item 6.

- a. Confirm that the meters listed in the response will continue to be tested in accordance with the regulations.

- b. Provide a summary of Southeast Daviess District's test results of meters other than the Sensus SR II meters for the past five years.

- c. Confirm that the meters listed in the response will be replaced, once they have reached the end of their useful life, with Sensus SR II meters the type of meters that are subject of the proposed sample testing.

4. Refer to Southeast Daviess District response to Staff's First Request, Item 10. b.

- a. Provide a detailed description, including the capabilities of the advanced metering infrastructure program titled, Sensus Analytics.

b. Confirm that for Southeast Daviess District to fully use the Sensus Analytics program the Sensus SR II meters must be installed on Southeast Daviess entire system.

5. Provide Southeast Daviess District current unaccounted-for water loss percentage for 2020.

6. State whether it is Southeast Daviess District's policy to install only new meters.

7. State whether Southeast Daviess District repairs meters when they are removed from service, other than in instances when the meter is under warranty.

8. State whether Southeast Daviess District rebuilds meters when they are removed from service, other than in instances when the meter is under warranty.

9. Explain how using the same sample testing group of meters each year for sample testing purposes is consistent with the ANSI standard.

10. Confirm the meters selected for sample testing identified in Southeast Daviess District's Application, Appendix A, were new when originally installed in Southeast Daviess District's system.

11. Explain why Southeast Daviess District does not propose to use the same Double Specification Limit for minimum flow rates as it does for maximum and intermediate flow rates.

12. Provide the cost differential for testing a meter just at the maximum and intermediate flows versus testing the meter at all three flow rates.

13. Explain whether the ANSI Standard anticipates increasing levels of scrutiny for subsequent lots if previous lots performed poorly, and if so, explain why Southeast Daviess sample testing plan does not require similar increased scrutiny.

14. Explain how Southeast Daviess District plans to statistically account for meters in its sample testing plan that were removed from the system due to failing to meet the flow rate standards in 807 KAR 5:066, Section 15.

15. Explain how Southeast Daviess District will identify a poorly performing subgroup of meters existing in the sample.

16. Refer to the ANSI Standard A8 in which it states that the ANSI Standard assumes that the underlying distribution of individual measurements to be normal in shape and states that a person knowledgeable in statistics should be consulted to advise whether the distribution appears suitable for sampling by variables. Explain why Southeast Daviess contends that the underlying distribution of individual measurements of its meters is normal in shape.



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

DATED AUG 12 2020

cc: Parties of Record

*Honorable Damon R Talley
Attorney at Law
Stoll Keenon Ogden PLLC
P.O. Box 150
Hodgenville, KENTUCKY 42748

*Mary Ellen Wimberly
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Southeast Daviess County Water District
3400 Bittel Road
Owensboro, KY 42301

*William G Higdon
Manager
Southeast Daviess County Water District
3400 Bittel Road
Owensboro, KY 42301