

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE JOINT APPLICATION OF WARREN COUNTY )  
WATER DISTRICT, SIMPSON COUNTY WATER )  
DISTRICT, AND BUTLER COUNTY WATER ) CASE NO. 2003-00391  
SYSTEMS, INC. FOR A DEVIATION FROM 807 )  
KAR 5:066, SECTION 16(1) )

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
WARREN COUNTY WATER DISTRICT, SIMPSON COUNTY WATER  
DISTRICT, AND BUTLER COUNTY WATER SYSTEMS, INC.

Pursuant to 807 KAR 5:001, Commission Staff requests that Warren County Water District, Simpson County Water District, and Butler County Water Systems, Inc. ("Applicants") file the original and 8 copies of the following information with the Commission within 14 days of the date of this request, with a copy to all parties of record. Each copy of the information requested shall be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention shall be given to copied material to ensure its legibility. 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.

1. The Applicants request that the Commission permit the formation of a sample group of SRII meters that would remain in service for as long as 20 years without testing. The Applicants state that the sample group will consist of approximately 200 meters from each year of manufacture from 1990 to 1997.

a. Explain why the number of meters in the sample group is stated as an approximate number instead of an exact number.

b. Describe how the Applicants will select the meters to place in the sample group.

2. State the total number of SRII meters that the Applicants currently have in use.

3. For each Applicant, state the number of SRII meters by year of manufacture currently in use on each Applicant's water distribution system.

4. State for each Applicant and for each sample group the number of meters from that Applicant's system that will comprise the sample group of 200 meters.

5. State the percentage of the total number of SRII meters on the Applicants' water system that the sample meter group will represent.

6. Explain why the Applicants chose a sample group of 200 meters from each year of manufacturer from 1990 to 1997.

7. Explain why Applicants precluded meters from 1986 to 1989 from the sample groups.

8. State whether Applicants currently test all SRII meters after these meters have been in service for 13 years.

9. State whether the Applicants return to service all SRII meters that have been in service for 13 years and that have been tested and found to be within proper specifications.

10. For each Applicant, identify who tests the SRII meters.

11. State the current cost of testing an SRII meter.

12. State the number of SRII meters that have been in service for 13 years that the Applicants have tested.

13. Explain why the Applicants cannot derive the same information on SRII meters by testing the meters as required under their current "Meter Testing and Replacement Program" and then retesting the same meters in 2010.

14. Explain how the Applicants' proposal is consistent with established scientific, engineering, and economic methods for determining meter-testing frequency.

15. Describe how Applicants' proposal is consistent with meter-testing programs conducted by other water utilities in Kentucky and the United States. List in this description all water utilities and water utility associations that Applicants contacted regarding meter testing frequency.

16. Provide the minutes of the meetings of Applicants' Board of Commissioners or Board of Directors in which the request for the proposed deviation was discussed.

17. Provide the resolution of the Applicants' Board of Commissioners or Board of Directors that authorized the Applicants to file their request for deviation.

18. Identify each person who participated in the development of the proposal for the new meter study and provide his or her curriculum vitae.



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Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED: August 13, 2004

cc: Parties of Record

Case No. 2003-00391