

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

|                                           |            |
|-------------------------------------------|------------|
| ELECTRONIC APPLICATION OF GREEN RIVER )   |            |
| VALLEY WATER DISTRICT FOR A CERTIFICATE ) |            |
| OF PUBLIC CONVENIENCE AND NECESSITY )     | CASE NO.   |
| TO INSTALL THE AMI PROJECT PURSUANT TO )  | 2026-00092 |
| THE PROVISIONS OF KRS 278.020 AND 807 )   |            |
| KAR 5:001 )                               |            |

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO GREEN RIVER VALLEY WATER DISTRICT

Green River Valley Water District (Green River Valley District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on August 17, 2026. The Commission directs Green River Valley District to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

---

<sup>1</sup> 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).

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

Green River Valley District shall make timely amendment to any prior response if Green River Valley 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 Green River Valley District fails or refuses to furnish all or part of the requested information, Green River Valley 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, Green River Valley 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. Provide the meter testing data for all meters removed from service in 2025, pursuant to 807 KAR 5:066, Section 15(2).
2. Refer to Green River Valley District's Response to Commission Staff's First Request for Information (Staff's First Request), Item 27.

a. Provide the annual depreciation amount for each project component. Include a breakdown of the costs by each component that reflects a different depreciation life and provide the National Association of Regulatory Utility Commissioners (NARUC) depreciable life for each component.

b. If different from the NARUC depreciable life provided above, explain why Green River Valley District is proposing to use a 20-year depreciation life for the Kamstrup customer meters.

c. If different from the NARUC depreciable life provided above, explain why Green River Valley District is proposing to use a 10-year depreciation life for the data collectors.

3. Refer to Green River Valley District's Response to Staff's First Request, Item 27. Confirm whether the 20-year warranty would be included for all meters purchased for the entire implementation of AMI. If not confirmed, explain and include the amount of meters expected to be included under the 20-year warranty.

4. Refer to the Application at 20 which states that the cost of replacing the 4,464 customer meters in Green River Valley District's system that are currently 10 years old or older with manual-read meters would be \$1,110,643.20, and states that the cost of installing that amount of AMR meters would be \$1,258,848. Compare the expected cost of full AMI implementation to the following:

a. The expected cost of replacing all meters in Green River Valley District's system with manual-read meters; and

b. The expected cost of replacing all meters in Green River Valley District's system with AMR meters.

5. Provide a detailed fix asset listing as of December 31, 2025, in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

6. Provide the remaining useful life and net book value for the meters to be replaced with AMI. In the response, include Green River Valley District's current undepreciated balance of the existing meters, as well as the undepreciated balance that it expects at the time AMI is placed in service.

7. Provide the remaining useful life and net book value of meters that were replaced in 2025.

8. Provide the number of meters Green River Valley District replaced in 2026 due to failure to register or perform properly. Provide the average remaining useful life of the failed meters.

9. Explain Green River Valley District's accounting treatment for meters that are replaced before the end of their useful life and designate where the disposition impact is reported in income statement for 2025.

10. Refer to Green River Valley District's Response to Staff's First Request, Item 21, which states that it is Green River Valley District's practice to replace meters when they reach 10 years of age instead of testing them. Refer also to 807 KAR 5:066, Section 16.

a. Explain why Green River Valley District replaced meters after ten years of service instead of testing after ten years of service.

b. Provide the quantitative benefits of replacing meters versus testing meters.

11. Provide the breakdown of cost of the entire meter testing process including, if applicable:

- a. Materials;
- b. Supplies;
- c. Labor;
- d. Transportation; and
- e. Other (Specify).

12. Refer to Green River Valley District's Response to Staff's First Request, Item 22. Provide the number of employees and the number of hours per week required for manual meter reading.

13. Provide Green River Valley District's unaccounted-for water loss percentage for 2026, by month, through present date.

14. Refer to Green River Valley District's Response to Staff's First Request, Item 19. Provide the unaccounted-for water loss percentage for the Hart County System and for the operating territory of the Edmonson District Area.

15. Confirm whether, following the full deployment of the proposed AMI meters through its entire system, Green River Valley District will continue its current practice of replacing its meters every 10 years.

- a. If not confirmed, explain.
- b. If confirmed, explain how Green River Valley District will account for the remaining net book value of the retired meters given its response to Staff's First Request, Item 27 where it states Green River Valley District proposes to use a 20-year depreciation life for the Kampstrup customer meters.

  
Justin McNeil  
Executive Director  
Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601-8294

DATED AUG 07 2026

cc: Parties of Record

## Service List for Case 2026-00092

\* Andrew Tucker  
General Manager  
Green River Valley Water District  
1180 E Main Street  
P. O. Box 460  
Horse Cave, KY 42749

\* Honorable Damon R Talley  
Attorney at Law  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KY 40507-1801

\* Green River Valley Water District  
1180 E Main Street  
P. O. Box 460  
Horse Cave, KY 42749

\* Tina C. Frederick  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KY 40507-1801