

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF MUHLENBERG COUNTY)	
WATER DISTRICT FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO. 2013-0043
CONSTRUCT AND FINANCE A WATER)	
IMPROVEMENTS PROJECT PURSUANT TO KRS)	
278.020 AND 278.300)	

COMMISSION STAFF'S REQUEST FOR INFORMATION
TO MUHLENBERG COUNTY WATER DISTRICT

Pursuant to 807 KAR 5:001, Muhlenberg County Water District ("Muhlenberg District") shall file with the Commission no later than May 30, 2013 the original and five copies of the following information, with a copy to all parties of record. Responses to requests for information shall be appropriately bound, tabbed and indexed. 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 preparer or 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. Muhlenberg District shall make timely amendment to any prior response if it 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 Muhlenberg District fails or refuses to furnish all or part of the

requested information, Muhlenberg District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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.

1. State whether Muhlenberg District has advertised for bids for the 5,800 meters that it proposes to purchase.

2. a. If Muhlenberg District has not advertised for bids for the proposed meters, state whether it intends to make newspaper advertisement for such bids.

b. If yes, state when Muhlenberg District intends to advertise for such bids.

c. If no, explain why not.

3. State whether KRS 424.260(1) applies to Muhlenberg District's proposed purchase of water meters. Explain your response and provide with the response all written opinions from Muhlenberg District's legal counsel on the applicability of KRS 424.260.

4. List the various types of water meters that Muhlenberg District considered prior to selecting the iPerl meter as the replacement for its existing meters. For each meter listed, explain why that meter type was deemed less suitable for Muhlenberg District's needs or plans.

5. Provide the minutes of each meeting of Muhlenberg District's Board of Commissioners in which the selection of replacement meters was discussed.

6. Provide the minutes of each meeting of Muhlenberg District's Board of Commissioners in which the proposed loan agreement was discussed or voted upon.

7. In Case No. 2011-00233¹, the Commission authorized Graves County Water District's purchase of iPerl water meters but required it to file with the Commission a written plan for a sample testing program to test the proposed metering equipment after its deployment to ensure it is operating within acceptable limits and is accurately registering water usage. State whether Muhlenberg District has developed a plan for testing the iPerl water meters that it intends to purchase. If yes, provide a copy of such plan.

8. Refer to 807 KAR 5:066, Section 15(2), which requires that all water meters be tested for accuracy prior to being placed into service.

a. Describe how Muhlenberg District intends to comply with this regulation upon its proposed purchase of the iPerl meters.

b. If Muhlenberg District intends to rely upon another entity to test the purchased meters, identify the entity that will perform the testing and state whether the Commission has approved that entity for testing water meters.

c. Describe the testing methods and procedures that will be employed to test the meters that Muhlenberg District proposes to purchase. This description should include, but not be limited to, the type of testing apparatus, the flow rates and test quantities used for each flow rate, and the location of the testing facility.

¹ Case No. 2011-00233, *Application of Graves County Water District for Approval of Construction and Issuance of a Certificate of Convenience and Necessity for the Purchase and Installation of Automated Meter Reading Equipment* (Ky. PSC Nov. 3, 2011).

d. State whether the testing methods and procedures that will be employed to test the meters that Muhlenberg District proposes to purchase comply with

(1) 807 KAR 5:066;

(2) American Water Works Association, *Water Meters – Selection, Installation, Testing and Maintenance* (AWWA Manual M6 Mar. 30, 2013).

e. If Muhlenberg District intends to rely upon the proposed meter manufacturer's testing results to comply with 807 KAR 5:066, Section 15(2), provide:

(1) The name, address, telephone number, and electronic mail address of the manufacturer representatives with whom Muhlenberg District has dealt and who has furnished the meter testing information to Muhlenberg District.

(2) All documents related to metering testing, including testing results and literature, that the manufacturer has provided to Muhlenberg District.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602

DATED: MAY 08 2013

cc: Parties of Record

Honorable W. Randall Jones
Attorney at Law
Rubin & Hays
Kentucky Home Trust Building
450 South Third Street
Louisville, KENTUCKY 40202