

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF</b>	)	
<b>HARDIN COUNTY WATER</b>	)	
<b>DISTRICT NO. 2 FOR A</b>	)	
<b>DECLARATORY ORDER THAT</b>	)	
<b>SAMPLE TESTING SATISFIES THE</b>	)	<b>CASE NO. 2016-00432</b>
<b>TESTING REQUIREMENTS OF 807</b>	)	
<b>KAR 5:066, SECTION 16(1) OR, IN</b>	)	
<b>THE ALTERNATIVE, FOR AN</b>	)	
<b>ORDER GRANTING A DEVIATION</b>	)	
<b>FROM 807 KAR 5:066, SECTION 16(1)</b>	)	

**MOTION FOR SUBMISSION**

Hardin County Water District No. 2 (“Hardin No. 2”) hereby moves the Kentucky Public Service Commission (“Commission”) to submit the above-referenced matter for a decision on the record without a formal hearing.

In support of its Motion, Hardin No. 2 states:

1. On July 13, 2017, Commission Staff held an informal conference and directed Hardin No. 2 to file into the record within fourteen days further information and support regarding the appropriateness of using both the Double Specification Limit (“DSL”) and Single Specification Limit (“SSL”) in its proposed sample meter testing plan. Commission Staff recommended Hardin No. 2 submit a question through the American Society for Quality’s (“ASQ”) “Ask the Experts” website to receive this further support.

2. On July 19, 2017, Hardin No. 2 submitted the following question to the ASQ's "Ask the Experts" website requesting confirmation that it is appropriate to use both the DSL and SSL in its sample meter testing plan:

We plan to use the ANSI/ASQ Z1.9-2003 (R2013) to sample test the accuracy of water meters at three different flow rates. The state regulatory agency provides accuracy parameters for water meters at a low flow rate, intermediate flow rate, and maximum flow rate. Each year, we plan to sample test meters of a certain age at these three different flow rates. At an intermediate and maximum flow rate, the regulatory parameters are 98.5-101.5. Because the regulations specify an upper and lower limit, we plan to use the Double Specification Limit method to sample test meters at intermediate and maximum flow rates. At low flow rates, however, the regulatory parameters state that the meter must meet 90 or above. Because the regulations specify only a lower limit for low flow rates, we plan to use the Single Specification Limit method to test accuracy at low flow rates. Is it appropriate under the Z1.9-2003 (R2013) to use both the Double Specification Limit and the Single Specification Limit in the same sample meter testing program?

3. On July 27, 2017, Hardin No. 2 filed a letter into the record explaining Hardin No. 2's efforts to receive an answer from the ASQ's "Ask the Experts" website and requesting a 30-day extension to file the supporting information into the record.

4. Hardin No. 2 has yet to receive a definitive response from the ASQ's "Ask the Experts" website. Hardin No. 2 has had correspondence with the ASQ, but has not received a definitive answer to its submitted question and is unsure if it will ever receive such a response. Further, Hardin No. 2 has not yet received responses to emails Hardin No. 2 sent to the ASQ's "Ask the Experts" email

address on August 2, 2017 and August 22, 2017, nor to its August 24, 2017 telephone call to Fred Schenkelberg, the ASQ expert with whom Hardin No. 2 has corresponded.

5. Given that Hardin No. 2 has not received a definitive response from the ASQ's "Ask the Experts," and is unsure if it will receive such a response in the future, Hardin No. 2 requests that the Commission submit this matter for a decision on the record without a formal hearing. In the event that Hardin No. 2 does receive a definitive response from the ASQ, it will file the response with the Commission.

6. In the alternative, if the Commission deems it necessary to have more information and support before submitting this matter for a decision on the record, Hardin No. 2 requests an informal conference to discuss the necessary information.

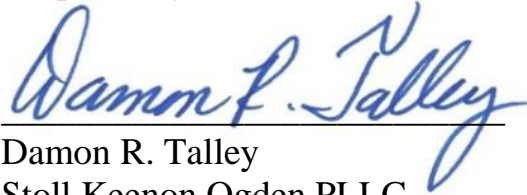
**WHEREFORE**, Hardin No. 2 respectfully requests the following:

(a) The Commission submit this matter for a decision on the record without a formal hearing; or

(b) In the alternative, if the Commission requires additional information and support, Hardin No. 2 requests an informal conference to discuss the necessary information.

Dated: August 25, 2017

Respectfully submitted,



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*Counsel for Hardin County Water District  
No. 2*

## CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the electronic filing of this Motion is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Public Service Commission on August 25, 2017; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of this Motion will be delivered to the Public Service Commission on or before August 29, 2017.

  
Damon R. Talley