

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

**In the Matter of:**

**ELECTRONIC INVESTIGATION            )  
INTO THE MEASURING,                    )  
RECORDING, AND REPORTING OF        ) CASE NO. 2018-00394  
WATER LOSS BY KENTUCKY'S            )  
JURISDICTIONAL WATER                )  
UTILITIES                                 )**

**RESPONSE OF**

**Southern Water and Sewer District**

**TO**

**COMMISSION'S REQUEST FOR INFORMATION**

**DATED DECEMBER 18, 2018**

**FILED: January 11, 2019**

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

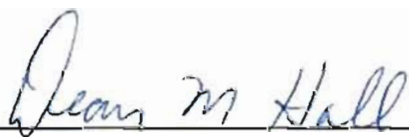
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**CERTIFICATION OF RESPONSE OF Southern Water and Sewer District  
TO  
COMMISSION'S REQUEST FOR INFORMATION**

This is to certify that I have supervised the preparation of Southern Water and Sewer District's Response to the Commission's Request for Information. The response submitted on behalf of Southern Water and Sewer District is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Date: 1-11-19

  
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Dean M. Hall, General Manager  
Southern Water and Sewer District

**Southern Water and Sewer District**

**CASE NO. 2018-00394**

**Response to Commission's Request for Information**

**Question No. 1**

**Responding Witness: Dean M. Hall**

- Q-1. Explain in detail the manner in which you measure, calculate, and track water loss, and:
- a. Identify whether you use any manual form (including Excel spreadsheet) or electronic or mechanized system to calculate and track water loss.
  - b. Provide a copy of any form used (including Excel spreadsheet).
  - c. Identify the source of any form or system used.
- A-1. Southern Water and Sewer District calculates its water loss by subtracting total gallons sold from the total gallons produced and/or purchased. Next, the utility and/or water treatment plant, system flushing, and fire department usage are calculated and subtracted from the difference of bought/produced vs. sold water. The remaining water unaccounted for is considered water loss and is attributed to tank overflows, line breaks and line leaks.
- a. The district uses a spreadsheet to calculate water loss percentage each month.
  - b. Please see attached.
  - c. The District has historically used the Monthly Water Loss Report form which originated from the Kentucky Public Service Commission.

**Southern Water and Sewer District**

**CASE NO. 2018-00394**

**Response to Commission's Request for Information**

**Question No. 2**

**Responding Witness: Dean M. Hall**

- Q-2. Explain in detail your understanding of the information to be provided in each of the categories on the Water Statistics page (reference page 30) of the annual report required of jurisdictional water utilities, accessed through the Commission's website.
- A-2. 1. Water Produced: Water produced from the Water Treatment Plant.
2. Water Purchased: All waters bought from other utilities.
3. Total Produced and Purchased: A combination of water produced at the plant and water purchased from other utilities.
4. Residential: Water sold under a Residential Rate Code.
5. Commercial: Water sold under a Commercial Rate Code.
6. Industrial: Water sold under an Industrial Rate Code.
7. Bulk Loading Stations: The district does not have such stations and assumes it is referring to a place to purchase water in bulk.
8. Resale: Water sold to wholesale customers who, in turn, resale purchased water to its customers.
9. Other Sales: Any other water sold not mentioned above.
10. Total Water Sales: The total water sold.

11. Utility/Water Treatment Plant: Any water that can be attributed to utility and/or water treatment plant operation.
12. Wastewater Plant: Any water attributed to treatment of wastewater at a utilities WWTP.
13. System Flushing: Water used for flushing within the system.
14. Fire Department: A non-reporting user that is presumed to be 0.3% of total water sales.
15. Other: Theft and customer adjustments.
16. Total Other Water Used: Total of water from lines 16-20.
17. Tank Overflows: Water attributed to tank overflows.
18. Line Breaks: Water attributed to located and repaired leaks.
19. Line Leaks: Water-loss attributed to unknown leaks.
- 20: Other: Water not listed in lines 24-26.
21. Total Line Loss: Total of lines 24-27.
22. Line 28 Divided by Line 4: Calculated Water Loss Percentage.

**Southern Water and Sewer District**

**CASE NO. 2018-00394**

**Response to Commission's Request for Information**

**Question No. 3**

**Responding Witness: Dean M. Hall**

Q-3. State any questions you have regarding how to use the updated Commission Form described and attached as Appendix A to this Order.

A-3. No questions

**Southern Water and Sewer District**

**CASE NO. 2018-00394**

**Response to Commission's Request for Information**

**Question No. 4**

**Responding Witness: Dean M. Hall**

Q-4. State any suggestions or improvements you have for the updated Commission Form described and attached as Appendix A to this Order.

A-4. 1. Adding a line item for illegal usage and excavation breaks in the "Other Water Used" would be beneficial to any Water District. Southern Water and Sewer District feels these events are out of the control of any Utility and should therefore not be penalized by such events.

2. Southern Water and Sewer District believes leaks that can be quantified and that are located and repaired during a monthly water loss audit should be considered "Accounted-For Water" instead of being a part of the system's overall Water Loss Percentage.

**Southern Water and Sewer District**

**CASE NO. 2018-00394**

**Response to Commission's Request for Information**

**Question No. 5**

**Responding Witness: Dean M. Hall**

- Q-5. State any questions you have regarding how the information in the updated Commission Form described and attached as Appendix A to this Order is to be incorporated into annual reports.
- A-5. Will the Water Statistics Page of the Annual Report reflect the changes in the updated Water Loss Report form?



**Southern Water and Sewer District**

**CASE NO. 2018-00394**

**Response to Commission's Request for Information**

**Question No. 6**

**Responding Witness: Dean M. Hall**

- Q-6. State any concerns you have regarding the use of the updated Commission Form described and attached as Appendix A to this Order.
- A-6. We are glad to see the PSC recognizing the "Excavation Damages" and "Theft" as individual categories in the updated form. However, we feel that the water attributed to these categories should not be included in the "Water Loss". It should rather be considered a part of "Other Water Used".

**Southern Water and Sewer District**

**CASE NO. 2018-00394**

**Response to Commission's Request for Information**

**Question No. 7**

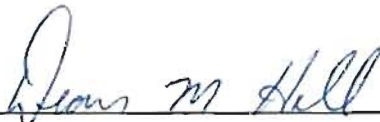
**Responding Witness: Dean M. Hall**

Q-7. State whether you believe it is reasonable, proper, and appropriate for the Commission to require jurisdictional water utilities to maintain and use the updated Commission Form described and attached as Appendix A to this Order. Fully explain your answer

A-7. Southern Water and Sewer District is happy to see the commission making changes to its water loss reporting spreadsheet and understands that there has to be an allowable percentage for utilities. Providing safe and reliable drinking water to customers in Appalachia brings with it greater difficulties than that of other regions located throughout Kentucky. Also, we believe that other characteristics such as operating pressure, system size and topography of the service area should be considered when assessing the health of a utility.

## CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Southern Water and Sewer District's electronic filing of this Response 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 January 11, 2019; 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 Response will be delivered to the Public Service Commission within two business days.

  
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Dean M. Hall

# PUBLIC SERVICE COMMISSION

## Monthly Water Loss Report

Water Utility:

For the Month of:  Year:

LINE #	ITEM	GALLONS (Omit 000's)
1	<b>WATER PRODUCED, PURCHASED &amp; DISTRIBUTED</b>	
2	Water Produced	-
3	Water Purchased	-
4	<b>TOTAL PRODUCED AND PURCHASED</b>	-
5		
6	<b>WATER SALES</b>	
7	Residential	-
8	Commercial	-
9	Industrial	-
10	Bulk Loading Stations	-
11	Wholesale	-
12	Other Sales	-
13	<b>TOTAL WATER SALES</b>	- #DIV/0!
14		
15	<b>OTHER WATER USED</b>	
16	Utility and/or Water Treatment Plant	-
17	Wastewater Plant	-
18	System Flushing	-
19	Fire Department	-
20	Other	-
21	<b>TOTAL OTHER WATER USED</b>	- #DIV/0!
22		
23	<b>WATER LOSS</b>	
24	Tank Overflows	-
25	Line Breaks	-
26	Line Leaks	-
27	Other	-
28	<b>TOTAL LINE LOSS</b>	- #DIV/0!
29		
30	Note: Line 13 + Line 21 + Line 28 Must Equal Line 4	
31		
32	<b>WATER LOSS PERCENTAGE</b>	
33	Unaccounted-For Water (Line 28 divided by Line 4)	#DIV/0!