

**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
LEVEE ROAD WATER ASSOCIATION
TO
COMMISSION'S REQUEST FOR INFORMATION
DATED DECEMBER 18, 2018**

FILED: January 11, 2019

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**CERTIFICATION OF RESPONSE OF
LEVEE ROAD WATER ASSOCIATION TO
COMMISSION'S REQUEST FOR INFORMATION**

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

Date: 01/11/2019



Chad Linkous, Field Manager
Levee Road Water Association

LEVEE ROAD WATER ASSOCIATION

CASE NO. 2018-00394

Response to Commission's Request for Information

Question No. 1

Responding Witness: Chad Linkous

- 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. Levee Road Water Association is a distribution system only. We purchase all water from Mt. Sterling Water & Sewer and sell to no consecutive systems. We measure monthly water purchased using the difference in master meter readings on the last day of each month. From this purchase amount we calculate the overall water loss by subtracting (1) the number of gallons sold to residential and commercial customers—as provided by our billing software, (2) gallons of water used for system flushing, (3) gallons of water used by the fire department, and (4) any other approved usage such as a customer leak adjustment. We further refine this water loss figure by estimating—mostly using master meter and individual meter readings—any

tank overflows, line breaks, and other measurable leaks. We track this data using the attached spreadsheet provided by PSC.

- a. We use the PSC Monthly Water Loss spreadsheet.
- b. A copy of the aforementioned spreadsheet is attached to the end of this document.
- c. This spreadsheet was provided by the PSC.

LEVEE ROAD WATER ASSOCIATION

CASE NO. 2018-00394

Response to Commission's Request for Information

Question No. 2

Responding Witness: Chad Linkous

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. The water statistics page requires entries in thousands of gallons for annual totals. Our understanding of each line is as follows:

- (1) A heading that groups lines (2) and (3)
- (2) Total water produced – always 0 for LRWA as we are distribution only.
- (3) Total water purchased – as calculated from master meter readings
- (4) The total for lines (2) and (3)
- (6) A heading that groups lines (7) through (12)
- (7) Total water sold to residential customers
- (8) Total water sold to commercial customers.
- (9) Total water sold to industrial customers – always 0 for LRWA.
- (10) Total water sold at bulk loading stations – always 0 for LRWA.
- (11) Total water resold to another system – always 0 for LRWA.
- (12) Total water sold by other means – usually 0 for LRWA.

- (13) The total for lines (7) through (12)
- (15) A heading that groups lines (16) through (20)
- (16) Total water used by utility/treatment plant to operate system – often 0 at LRWA as we are distribution only
- (17) Total water used by wastewater plant – always 0 at LRWA
- (18) Total water used for system flushing.
- (19) Total water used by fire department.
- (20) Total water used by other approved means.
- (21) The total for lines (16) through (20)
- (23) A heading that groups lines (24) through (27)
- (24) Total water lost to tank overflows.
- (25) Total water lost to line breaks.
- (26) Total water lost to line leaks.
- (27) Total water lost by other means.
- (28) The total for lines (24) through (27)
- (32) A heading for line (33)
- (33) The percentage of water produced and purchased reported as water loss.

LEVEE ROAD WATER ASSOCIATION

CASE NO. 2018-00394

Response to Commission's Request for Information

Question No. 3

Responding Witness: Chad Linkous

- 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. How should we arrive at the figures for thousands of gallons? Specifically, should we truncate, round up, or use some other method?

LEVEE ROAD WATER ASSOCIATION

CASE NO. 2018-00394

Response to Commission's Request for Information

Question No. 4

Responding Witness: Chad Linkous

- 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. An appendix should be added giving common examples that are appropriate for lines (13) and (21). The appendix could also address common mistakes ad address frequently asked questions.

LEVEE ROAD WATER ASSOCIATION

CASE NO. 2018-00394

Response to Commission's Request for Information

Question No. 5

Responding Witness: Chad Linkous

- 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. We have no questions as long as the annual report is indeed updated to match the form in appendix A.

LEVEE ROAD WATER ASSOCIATION

CASE NO. 2018-00394

Response to Commission's Request for Information

Question No. 6

Responding Witness: Chad Linkous

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 have always felt that the 15% goal was rather arbitrary and should be considered on a case by case basis. Improvement in water loss over time should be at least equally important. In addition, since *the policy implemented by this regulation is "intended to serve as an incentive to promote efficient management,"* it stands to reason that there will be times when it is more efficient to incur some water loss than it is to immediately address a problem at all costs. Perhaps there needs to be a procedure where a utility can obtain commission approval to enter an amount normally intended for lines (25)—(30) into line (21) instead.

LEVEE ROAD WATER ASSOCIATION

CASE NO. 2018-00394

Response to Commission's Request for Information

Question No. 7

Responding Witness: Chad Linkous

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. We 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. However, we feel that the results obtained from this process should be a starting point for decisions relevant to water loss, rather than the sole determinant. The commission should consider the underlying reasons that water loss is not as low as it could be.

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Levee Road Water Association'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.



Chad Linkous

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

For the Month of: Year:

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