

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

ORDER

Upon its own motion, the Commission initiates this investigation to review the adequacy of the methods used by Kentucky's jurisdictional water utilities to measure, record, and report their water loss. As part of this investigation, the Commission will provide guidance to jurisdictional water utilities regarding the reporting of water loss, as well as provide an updated water loss form for measuring and tracking this loss.

The Commission has plenary authority under KRS 278.040 to regulate the rates and services of jurisdictional utilities and to enforce the provisions of KRS Chapter 278. KRS 278.030 requires every utility to furnish "adequate, efficient and reasonable" service. KRS 278.260 permits the Commission, on its own motion, to investigate any act or practice of a utility that affects or is related to the service of a utility. KRS 278.280(1) further permits the Commission, after conducting such investigation and finding that a practice is unreasonable, unsafe, improper, or inadequate, to determine the reasonable, safe, proper, or adequate practice or methods to be observed and to fix the same by order, rule, or regulation. KRS 278.230 permits the Commission to inspect the books and records of any jurisdictional utility, provides that jurisdictional utilities' books and records shall be available to the Commission, and permits the Commission to require jurisdictional utilities to file "reports . . . or other information" that the Commission reasonably requires.

KRS 278.280(2) directs the Commission to prescribe rules for the performance of services by utilities. Pursuant to this authority, the Commission promulgated 807 KAR 5:006, Section 4(2), which includes a requirement that each jurisdictional utility file an annual report using the reporting forms available on the Commission's website at <http://psc.ky.gov/>. This annual report requires jurisdictional water utilities to provide information regarding their total line loss, including "unaccounted-for" water.¹

The Commission has defined "unaccounted for water" at 807 KAR 5:067, Section 1(7):

"Unaccounted for water" means the volumetric sum of all water purchased and produced by the utility less the volume of water:

- (a) Sold;
- (b) Provided to customers without charge as authorized by the utility's tariff; and
- (c) Used by the utility to conduct the daily operation and maintenance of its treatment, transmission, and distribution systems.

Thus, unaccounted-for water loss is "the difference of the total amount of water produced and purchased and the sum of water sold, water used for fire protection purposes,² and water used in treatment and distribution operations (e.g., backwashing filters, line

¹ See generally *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*, Case No. 2011-00233 (Ky. PSC Nov. 3, 2011), Order at 2 n.5. The information provided can also be used to calculate other important information, such as nonrevenue water. See *Id.* Nonrevenue water is defined as "those components of system input volume that are not billed and produce no revenue; equal to unbilled authorized consumption plus apparent losses plus real losses." *Id.* (citing American Water Works Association, *Water Audits and Loss Control Programs* (3d ed. 2009) at 271)).

² When provided without charge pursuant to the utility's tariff.

flushing).”³ Generally speaking, the unaccounted-for water loss is the result of line breaks and leaks, inaccurate meters, tank overflows, excavation damages, and theft.⁴

Pursuant to KRS 278.280(2), the Commission also promulgated 807 KAR 5:066, Section 6(3), which states in part:

Except for purchased water rate adjustments for water districts and water associations, and rate adjustments pursuant to KRS 278.023(4), for rate making purposes a utility’s unaccounted-for water loss shall not exceed fifteen (15) percent of total water produced and purchased, excluding water used by a utility in its own operations.

The policy implemented by this regulation is “intended to serve as an incentive to promote efficient management.”⁵ The Commission views excessive water loss as a potential warning sign as to the financial health and well-being of jurisdictional water

³ *Application of Cannonsburg Water District for (1) Approval of Emergency Rate Relief and (2) Approval of the Increase in Nonrecurring Charges*, Case No. 2011-00217 (Ky. PSC Feb. 27, 2012), Order at 5 n.12.

⁴ See, e.g., *Application of Ledbetter Water District for an Alternative Rate Adjustment*, Case No. 2018-00117 (Ky. PSC Sept. 10, 2018), Order at 3 (excessive water loss caused by large leak); *Electronic Application of Hardin County Water District No. 2 for a Declaratory Order that Sample Testing Satisfies the Testing Requirements of 807 KAR 5:066, Section 16(1) or, in the Alternative, for an Order Granting a Deviation [There]From*, Case No. 2016-00432 (Ky. PSC March 22, 2018), Order at 7-8 n.28 (noting potential loss from defective meters); *Electronic Application of McCreary County Water District for Authorization to Execute Lease-Purchase Agreement and Related Relief*, Case No. 2018-00038 (Ky. PSC June 28, 2018), Order at 5 (granting Certificate of Public Convenience and Necessity (CPCN) based, in part, on project “reduc[ing] unaccounted-for water loss because of quicker detection of water leaks, meter tampering, and theft”); *Application of Cumberland Falls Highway Water District for Approval of Financing and Issuance of a Certificate of Convenience and Necessity*, Case No. 2017-00268 (Ky. PSC Aug. 14, 2017), Order at 2 (approving CPCN based, in part, on finding that project will lower water loss by replacing leak-prone lines); *Application of Mountain Water District for an Adjustment of Water and Sewer Rates*, Case No. 2014-00342 (Ky. PSC Oct. 9, 2015), Order at 11 (noting utility representation that excessive water loss was attributable to “inaccurate meters, theft of service, and infrastructure failure”); *Alternative Rate Filing of Eastern Rockcastle Water Association, Inc.*, Case No. 2014-00385 (Ky. PSC May 15, 2015), Order at 6-7 (noting loss from inaccurate meter); *Application of Hardin County Water District No. 1 to Modify Water Utility Tariff of Master Meters for Billing Multi-Unit Residential Properties*, Case No. 2009-00113 (Ky. PSC Oct. 22, 2010), Order at 2 (noting that stolen water contributes to water loss); *Hardin County Water District No. 1’s Proposed Tariff Allowing the Use of Master Meters in Manufactured Housing Communities*, Case No. 2007-00461 (Ky. PSC Aug. 14, 2008), Order at 2 (same).

⁵ *In the matter of the Notice by Lake Village Water Association, Inc., of a Tariff Amendment Adjusting Rates and Imposing Construction Surcharge*, Case No. 89-075 (Ky. PSC Jan. 29, 1990), Order at 5.

utilities.⁶ Water loss is lost potential revenue,⁷ and excessive water loss can have many negative effects, from higher rates for consumers⁸ to the ultimate failure⁹ of a water utility. Moreover, to the extent excessive water loss is the result of poor infrastructure, it may reflect the potential for health risks from contaminants infiltrating the water system.¹⁰ The annual reporting form for jurisdictional water utilities, filed pursuant to 807 KAR 5:006, Section 4(2), specifically seeks information regarding water loss in order to implement 807 KAR 5:066 and its underlying policies.

The Commission has noted in numerous recent orders that it is placing greater emphasis on monitoring utilities that consistently exceed the 15 percent unaccounted-for water loss threshold, and has strongly encouraged utilities to continue to pursue

⁶ See generally *Electronic Application of Estill County Water District No. 1 for Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2017-00176 (Ky. PSC Dec. 20, 2017), Order at 4.

⁷ *Electronic Application of Hardin County Water District No. 2 for a Declaratory Order that Sample Testing Satisfies the Testing Requirements of 807 KAR 5:066, Section 16(1) or, in the Alternative, for an Order Granting a Deviation [There]From*, Case No. 2016-00432 (Ky. PSC March 22, 2018), Order at 7-8 n.28 (noting that water loss can decrease revenue, which is “ultimately borne by the consumer in the form of higher rates.”).

⁸ *Id.*

⁹ See *Lovellaceville Water Company Request to Abandon*, Case No. 2014-00136 (Ky. PSC Oct. 31, 2014), Order at 5 (citing a “significant water loss rate,” along with poor infrastructure and low customer count as causes for the water utility being unable to continue operations).

¹⁰ *Application of Hardin County Water District No. 1 to Modify Water Utility Tariff of Master Meters for Billing Multi-Unit Residential Properties*, Case No. 2009-00113 (Ky. PSC Oct. 22, 2010), Order at 2; see also *Hardin County Water District No. 1’s Proposed Tariff Allowing the Use of Master Meters in Manufactured Housing Communities*, Case No. 2007-00461 (Ky. PSC Aug. 14, 2008), Order at 2 (noting health risks from inadequate infrastructure and stolen water).

reasonable actions to reduce unaccounted-for water loss.¹¹ The Commission is aware that some jurisdictional water utilities are having difficulty properly measuring and reporting their water loss, as required by statute and regulation. To assist in proper measurement and reporting, the Commission has developed an updated Water Use & Loss Calculation Form (the Commission Form), attached as Appendix A. Additionally, the Commission has prepared instructions, contained in the attached Appendix B, on how to use the Commission Form to accurately report water loss. Furthermore, in order to achieve efficiency, once a final updated Commission Form has been issued, the Commission will update the Water Statistics page (reference page 30) of the annual report that must be filed pursuant to 807 KAR 5:006, Section 4(2), to be identical to the updated Commission Form. This will allow the easy transfer of required information by the jurisdictional water utilities.

In this administrative case, the Commission will investigate the adequacy of the methods used by Kentucky's jurisdictional water utilities to measure, record, and report their water loss. This investigation will include consideration of the required use of the updated Commission Form for measuring and tracking this loss.

IT IS HEREBY ORDERED that:

1. An investigation of the measurement, recording, and reporting of water loss of Kentucky's jurisdictional water utilities is instituted. Each water utility operating under

¹¹ See, e.g., *Application of Ledbetter Water District for an Alternative Rate Adjustment*, Case No. 2018-00117 (Ky. PSC Sept. 10, 2018) Order at 3; *Purchased Water Adjustment of South Woodford County Water District*, Case No. 2018-00277 (Ky. PSC Sept. 5, 2018), Order at 2; *Electronic Purchased Water Adjustment of Estill County Water District No. 1*, Case No. 2018-00269 (Ky. Sept. 5, 2018), Order at 2; *Application of Whitley County Water District No. 1 for Approval of Financing and Issuance of a Certificate of Convenience and Necessity*, Case No. 2018-00235 (Ky. PSC Aug. 30, 2018), Order at 2; *Application of Whitley County Water District #1 for Approval to Enter into a Lease Agreement with the Kentucky Association of Counties Leasing Trust for an Approximate Principal Amount of \$2,715,000 for the Purpose Financing Certain Outstanding Obligations*, Case No. 2018-00211 (Ky. PSC Aug. 21, 2018), Order at 2.

Commission jurisdiction is made a party to this proceeding and shall be served with a copy of this order.

2. Requests for intervention shall be filed no later than January 11, 2019. As set forth in 807 KAR 5:001, Section 4(11)(a), a person requesting permissive intervention in a Commission proceeding is required to demonstrate either (1) a special interest in the proceeding not adequately represented in the case, or (2) that the person requesting permissive intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. Therefore, any person requesting to intervene in a Commission proceeding must state with specificity the person's special interest that is not otherwise adequately represented, or the issues and facts that the person will present that will assist the Commission in fully considering the matter. In addition, any motion to intervene filed after January 11, 2019, shall also show good cause for being untimely. If the untimely motion is granted, the movant shall accept and abide by the existing procedural schedule.

3. Each jurisdictional water utility shall file, no later than 30 days of the issuance of this Order, its original responses to the requests for information contained in the attached Appendix C.

4. a. Responses to requests for information shall be appropriately bound, tabbed, and indexed, with the original in paper medium and an electronic version to the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

b. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or an 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.

c. A party 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.

d. For any request to which a party fails or refuses to furnish all or part of the requested information, that party shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

e. 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.

f. Any party filing a paper containing personal information shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that the personal information cannot be read.

5. At any public hearing in this matter, neither opening statements nor summarization of direct testimonies shall be permitted.

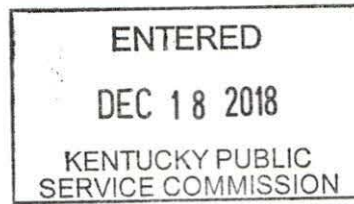
6. Pursuant to KRS 278.360 and 807 KAR 5:001, Section 9(9), a digital video recording shall be made of any hearing.

7. The Commission does not look favorably on motions for continuance. Accordingly, motions for extensions of time with respect to the schedule herein shall be made in writing and will be granted only upon a showing of good cause.


8. Nothing contained herein shall prevent the Commission from entering further Orders in this matter.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

By the Commission



ATTEST:



Executive Director

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2018-00394 DATED **DEC 18 2018**

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	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	-
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	
20	Fire Department	
21	Other Usage (explain) _____	
22	TOTAL OTHER WATER USED	-
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	
27	Line Leaks	
28	Excavation Damages	
29	Theft	
30	Unknown Loss	
31	TOTAL LINE LOSS	-
32		
33	Note: Line 14 + Line 22 + Line 31 MUST Equal Line 4	
34		
35	WATER LOSS PERCENTAGE FOR RATEMAKING PURPOSES	
36	(Line 31 divided by Line 4)	0.00%

APPENDIX B

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2018-00394 DATED **DEC 18 2018**

Instructions for the Public Service Commission Updated Commission Form

Water Produced, Purchased, & Distributed

Line 2: Provide the number of thousands of gallons of water produced by the utility for the corresponding month. For example, a utility producing 10,000 gallons would enter "10" (omitting the last three zeros) into the cell.

Line 3: Provide the number of thousands of gallons of water purchased by the utility from third-parties, for example, under a water purchase agreement, for the corresponding month.

Line 4: The "Total Produced and Purchased" should match the sum of both water produced and purchased above. This row will automatically calculate if the preceding lines are correctly filled out.

Water Sales

Lines 7-12: Provide the number of thousands of gallons of water sold for each category listed. Sales to "Public Authorities" are typically sold under a special contract or tariff to, for example, a fire department or other governmental entity.

Lines 13: If there are sales for categories other than the ones listed in Lines 7-12 above, provide the thousands of gallons of water sold for "Other Sales" and an explanation that details what was sold. If an explanation is not given, the form will not calculate Line 14 and instead will give an error message to the right. Most sales should fall into the categories in Lines 7-12, such that most utilities will enter "0" into the "Other Sales" line.

Line 14: The sum of Lines 7-13 should match the amount of "Total Water Sales" in this row. This row will automatically calculate if the preceding lines are correctly filled out.

Other Water Used

Lines 17-21: This category includes water that is properly used, but not sold and, therefore, does not generate revenue for the utility. Entries should be made using thousands of gallons of water (omitting the last three zeros). All gallons of water that are reported in this category should be supported with records to be kept at the utility's office and are subject to examination by the Division of Inspections.

Line 17: Provide the thousands of gallons of water used solely for the purpose of the utility and/or water treatment use. This would include, for example, backwashing the filtration system of the water treatment plant.

Line 18: Provide the thousands of gallons of water used for wastewater use. This would include but not limited to, for example, water used to wash down/clean the waste water plant.

Line 19: Provide the thousands of gallons of water used for system flushing, which is typically water used to keep water fresh and chlorine residuals up, and water used to flush lines to protect from Total Trihalomethanes (known as TTHM) and Haloacetic acids (known as HAA).

Line 20: Provide the thousands of gallons of water used by the Fire Department that are not provided in "Sales to Public Authorities" in Line 12. Only enter gallons for "Fire Department" use if the water is provided at no cost pursuant to the utility's tariff. All sales to fire departments should be entered in the sales category above. Pursuant to the requirements of KRS 278.170(3) and 807 KAR 5:095 Section 9, a utility that permits a fire department to use water at no charge or reduced rates shall require the fire department to submit quarterly reports demonstrating its water usage. 807 KAR 5:095 further requires a utility to include a penalty in its tariff for any fire department's failure to submit the required reports.

Line 21: If there are categories of legitimate, cost-free water usage other than the ones listed in Lines 17-20 above, provide the thousands of gallons of water used for "Other Usage" and an explanation that details what was used. If an explanation is not given, the form will not calculate Line 22 and instead will give an error message to the right. Most legitimate usage should fall into the categories on Lines 17-20, such that most utilities will enter "0" into the "Other Usage" line.

Line 22: The sum of Lines 17-21 should match the amount of "Total Other Water Used" in this row. This row will automatically calculate if the preceding lines are correctly filled out.

Water Loss

Lines 25-30: All gallons of water reported for these lines represent all other water that is not sold or used in the production and transmission of water to customers. Any amounts included in these lines are part of the calculation of the Water Loss Percentage for Ratemaking Purposes below. The utility should be prepared to support any amounts that appear in Lines 25-29 with records kept at the utility's office and are subject to examination by the Division of Inspections.

Line 30: Provide the amount of loss that is not known and no record can be kept to substantiate the loss. This line should be used as little as possible.

Line 31: The sum of Lines 25-30 should match the amount of "Total Line Loss" in this row. This row will automatically calculate if the preceding lines are correctly filled out.

Water Loss Percentage for Ratemaking Purposes

Line 36: The "Water Loss Percentage for Ratemaking Purposes" in Line 36 will automatically calculate if all other lines on the form are filled out correctly. If the sum of Lines 14, 22, and 31 do not equal Line 4, the form will return an error in red that the Lines do not equal.

APPENDIX C

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2018-00394 DATED **DEC 18 2018**

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 electric 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.
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.
3. State any questions you have regarding how to use the updated Commission Form described and attached as Appendix A to this Order.
4. State any suggestions or improvements you have for the updated Commission Form described and attached as Appendix A to this Order.
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.
6. State any concerns you have regarding the use of the updated Commission Form described and attached as Appendix A to this Order.

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.

*Estill County Water District #1
Estill County Water District #1
76 Cedar Grove Road
Irvine, KY 40336

*Big Sandy Water District
Big Sandy Water District
18200 Kentucky Route #3
Catlettsburg, KY 41129

*North Marshall Water District
North Marshall Water District
96 Carroll Road
Benton, KY 42025

*Allen County Water District
Allen County Water District
330 New Gallatin Road
P. O. Box 58
Scottsville, KY 42164

*Beech Grove Water System, Inc.
Beech Grove Water System, Inc.
445 State Route 56 North
Calhoun, KY 42327

*Boone County Water District
Boone County Water District
2475 Burlington Pike
P. O. Box 18
Burlington, KY 41005

*East Daviess County Water Associatio
East Daviess County Water Association, Inc.
9210 Highway Route 144
Knottsville, KY 42366

*Rattlesnake Ridge Water District
Rattlesnake Ridge Water District
3563 State Highway 1661
P. O. Box 475
Grayson, KY 41143-0475

*West Carroll Water District
West Carroll Water District
225 Sixth Street
P. O. Box 45
Carrollton, KY 41008

*East Casey County Water District
East Casey County Water District
690 S Wallace Wilkinson Blvd
P. O. Box 56
Liberty, KY 42539

*Center Ridge Water District No. 2
Center Ridge Water District No. 2
1980 Buffalo Road
New Concord, KY 42076

*Breathitt County Water District
Breathitt County Water District
1137 Main Street, Suite 305
Jackson, KY 41339

*Bullock Pen Water District
Bullock Pen Water District
One Farrell Drive
P. O. Box 188
Crittenden, KY 41030

*Black Mountain Utility District
Black Mountain Utility District
609 Four Mile Road
Baxter, KY 40806-8437

*Judy Water Association, Inc.
Judy Water Association, Inc.
2010 Maysville Road
P. O. Box 781
Mt. Sterling, KY 40353-0781

*McKinney Water District
McKinney Water District
2900 KY HWY 198
Stanford, KY 40484

*Barkley Lake Water District
Barkley Lake Water District
1420 Canton Road
P. O. Box 308
Cadiz, KY 42211

*Murray #2 Water District
Murray #2 Water District
201 New Providence Road
Murray, KY 42071

*Bath County Water District
Bath County Water District
21 Church Street
P. O. Box 369
Salt Lick, KY 40371

*Levee Road Water Association, Inc.
Levee Road Water Association, Inc.
4969 Levee Road
P. O. Box 770
Mt. Sterling, KY 40353

*Bronston Water Association, Inc.
Bronston Water Association, Inc.
2013 Highway 90
P. O. Box 243
Bronston, KY 42518

*Buffalo Trail Water Association, Inc
Buffalo Trail Water Association, Inc.
41135 Highway 62
Mayslick, KY 41055

*Dexter-Almo Heights Water District
Dexter-Almo Heights Water District
351 Almo Road
Almo, KY 42020

*South Anderson Water District
South Anderson Water District
142 South Main Street
P. O. Box 17
Lawrenceburg, KY 40342

*Cumberland County Water District
Cumberland County Water District
133 Lower River Street
Burkesville, KY 42717-9622

*Southern Water & Sewer District
Southern Water & Sewer District
245 Kentucky Route 680
P. O. Box 610
McDowell, KY 41647

*Elkhorn Water District
Elkhorn Water District
7165 US 127 North
P. O. Box 67
Frankfort, KY 40602

*Cumberland Falls Highway Water Distr
Cumberland Falls Highway Water District
6926 Cumberland Falls Highway
Corbin, KY 40701-8637

*East Laurel Water District
East Laurel Water District
1670 Hal Rogers Parkway
P. O. Box 726
London, KY 40743

*Eastern Rockcastle Water Association
Eastern Rockcastle Water Association, Inc.
9246 Main Street
Livingston, KY 40445

*Francis Water Company, Inc.
Francis Water Company, Inc.
P. O. Box 38
Garrett, KY 41630

*Wood Creek Water District
Wood Creek Water District
1670 Hal Rogers Parkway
P. O. Box 726
London, KY 40743

*Farmdale Water District
Farmdale Water District
100 Highwood Drive, Route 8
Frankfort, KY 40601

*Corinth Water District
Corinth Water District
215 Thomas Lane
P. O. Box 218
Corinth, KY 41010

*West Laurel Water Association, Inc.
West Laurel Water Association, Inc.
1670 Hal Rogers Parkway
P. O. Box 726
London, KY 40741

*Fountain Run Water District #1
Fountain Run Water District #1
226 Main Street
P.O. Box 118
Fountain Run, KY 42133

*Cunningham Water District
Cunningham Water District
7506 US Highway 52
P. O. Box 644
Cunningham, KY 42035

*Harrison County Water Association, I
Harrison County Water Association, Inc.
2167 US 27 South
Cynthiana, KY 41031

*Gary Larimore
Education Services Director
Kentucky Rural Water Association
Post Office Box 1424
1151 Old Porter Pike
Bowling Green, KENTUCKY 42102-1424

*Bracken County Water District
Bracken County Water District
1324 Brooksville Germantown Road
P. O. Box 201
Brooksville, KY 41004

*Muhlenberg County Water District
Muhlenberg County Water District
301 Dean Road
P. O. Box 348
Greenville, KY 42345

*Gallatin County Water District
Gallatin County Water District
4500 Highway 455
Sparta, KY 41086

*Garrison-Quincy-Ky-O-Heights Water D
Garrison-Quincy-Ky-O-Heights Water District
279 Robins Lane
P. O. Box 279
Garrison, KY 41141

*Hyden-Leslie County Water District
Hyden-Leslie County Water District
356 Wendover Road
Hyden, KY 41749

*Symsonia Water District
Symsonia Water District
11105 State Rt. 131
P. O. Box 99
Symsonia, KY 42082-9801

*Sharpsburg Water District
Sharpsburg Water District
16 East Mill Street
P. O. Box 248
Sharpsburg, KY 40374

*Laurel County Water District #2
Laurel County Water District #2
3910 South Laurel Road
London, KY 40744

*Caldwell County Water District
Caldwell County Water District
118 West Market Street
Princeton, KY 42445

*Grayson County Water District
Grayson County Water District
21 Shull White Road
P. O. Box 217
Leitchfield, KY 42754

*Kirksville Water Association, Inc.
Kirksville Water Association, Inc.
297 Michelle Drive
P. O. Box 670
Richmond, KY 40476-0670

*Hardin County Water District #2
Hardin County Water District #2
360 Ring Road
P. O. Box 970
Elizabethtown, KY 42702-0970

*Milburn Water District
Milburn Water District
7731 State Route 80 East
Arlington, KY 42021

*Madison County Utilities District
Madison County Utilities District
297 Michelle Drive
P. O. Box 670
Richmond, KY 40476-0670

*Graves County Water District
Graves County Water District
P. O. Box 329
Mayfield, KY 42066

*Martin County Water District
Martin County Water District
387 East Main Street, Suite 140
Inez, KY 41224

*Christian County Water District
Christian County Water District
1940 Dawson Springs Road
P. O. Box 7
Hopkinsville, KY 42241-0007

*Butler County Water System, Inc.
Butler County Water System, Inc.
1118 S Main Street, Suite 1
Morgantown, KY 42261

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

*Jackson County Water Association, In
Jackson County Water Association, Inc.
U. S. Highway 421 South
P. O. Box 232
Tyner, KY 40486

*Simpson County Water District
Simpson County Water District
523 US Highway 31W Bypass
P. O. Box 10180
Bowling Green, KY 42102

*Green-Taylor Water District
Green-Taylor Water District
250 Industrial Park Road
P. O. Box 168
Greensburg, KY 42743

*Jessamine-South Elkhorn Water Distri
Jessamine-South Elkhorn Water District
802 S Main Street
P. O. Box 731
Nicholasville, KY 40356

*Warren County Water District
Warren County Water District
523 US Highway 31W Bypass
P. O. Box 10180
Bowling Green, KY 42102-4780

*Jonathan Creek Water District
Jonathan Creek Water District
7564 U. S. Highway 68E
P. O. Box 414
Benton, KY 42025

*Knox County Utility Commission
Knox County Utility Commission
1905 Highway 930
Barbourville, KY 40906

*East Logan Water District, Inc.
East Logan Water District, Inc.
333 S Franklin Street
Russellville, KY 42276

*Pendleton County Water District
Pendleton County Water District
331 Highway 330 W
P. O. Box 232
Falmouth, KY 41040

*Knott County Water & Sewer District
Knott County Water & Sewer District
7777 Big Branch Road
Vicco, KY 41773

*West Shelby Water District
West Shelby Water District
7101 Shelbyville Road
P. O. Box 39
Simpsonville, KY 40067

*Justin M. McNeil
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Cawood Water District
Cawood Water District
54 Plant Road
P. O. Box 429
Cawood, KY 40815

*Lake Village Water Association, Inc.
Lake Village Water Association, Inc.
801 Pleasant Hill Drive
P. O. Box 303
Burgin, KY 40310

*Jessamine County Water District #1
Jessamine County Water District #1
2225 Lexington Road
Nicholasville, KY 40356-9702

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Lyon County Water District
Lyon County Water District
5464 U. S. Highway 62 West
P. O. Box 489
Kuttawa, KY 42055

*Fleming County Water Association, In
Fleming County Water Association, Inc.
2772 Morehead Road
P. O. Box 327
Flemingsburg, KY 41041

*Larue County Water District #1
Larue County Water District #1
6215 L & N Turnpike
Buffalo, KY 42716

*Edmonson County Water District
Edmonson County Water District
1128 Highway 259N
P. O. Box 208
Brownsville, KY 42210

*Kent Chandler
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Ledbetter Water District
Ledbetter Water District
1483 US Highway 60W
P. O. Box 123
Ledbetter, KY 42058-0123

*Northern Kentucky Water District
Northern Kentucky Water District
2835 Crescent Springs Road
P. O. Box 18640
Erlanger, KY 41018-0640

*Henry County Water District #2
Henry County Water District #2
8955 Main Street
P. O. Box 219
Campbellsburg, KY 40011

*Kentucky-American Water Company
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Letcher County Water and Sewer Distr
Letcher County Water and Sewer District
6 Broadway Street, Suite B
Whitesburg, KY 41858-7344

*McCreary County Water District
McCreary County Water District
Highway 27
P. O. Box 488
Whitley City, KY 42653

*Morgan County Water District
Morgan County Water District
1009 Hwy 172
West Liberty, KY 41472

*North Logan Water District #1
North Logan Water District #1
3118 Lewisburg Road
Russellville, KY 42276

*Magoffin County Water District
Magoffin County Water District
749 Parkway Road
P. O. Box 490
Salyersville, KY 41465

*Muhlenberg County Water District #3
Muhlenberg County Water District #3
4789 Main Street
P. O. Box 67
Bremen, KY 42325

*North Nelson Water District
North Nelson Water District
5555 Louisville Road
P. O. Box 25
Cox's Creek, KY 40013

*Montgomery County Water District #1
Montgomery County Water District #1
4412 Camargo Road
Mt. Sterling, KY 40353

*South Woodford Water District
South Woodford Water District
117-D Crossfield Drive
Versailles, KY 40383

*North Shelby Water Company
North Shelby Water Company
4596 Bagdad Road
P. O. Box 97
Bagdad, KY 40003

*Marion County Water District
Marion County Water District
1835 Campbellsville Road
P. O. Box 528
Lebanon, KY 40033

*Nicholas County Water District
Nicholas County Water District
1639 Old Paris Road
Carlisle, KY 40311

*Nebo Water District
Nebo Water District
45 North Bernard Street
Nebo, KY 42441

*Monroe County Water District
Monroe County Water District
205 Capp Harlan Road
Tompkinsville, KY 42167

*North McLean County Water District
North McLean County Water District
217 Hill Street
P. O. Box 68
Livermore, KY 42352

*Carroll County Water District #1
Carroll County Water District #1
205 Main Cross Street
P. O. Box 350
Ghent, KY 41045

*Meade County Water District
Meade County Water District
1003 Armory Place
P. O. Box 367
Brandenburg, KY 40108

*Northeast Woodford County Water Dist
Northeast Woodford County Water District
225A South Main Street
Versailles, KY 40383

*Powell's Valley Water District
Powell's Valley Water District
31 Adams Ridge Road
P. O. Box 550
Clay City, KY 40312

*North Mercer Water District
North Mercer Water District
P. O. Box 79
Salvisa, KY 40372

*North Hopkins Water District
North Hopkins Water District
316 Liberty Church Loop
Madisonville, KY 42431

*Henderson County Water District
Henderson County Water District
655 South Main Street
P. O. Box 655
Henderson, KY 42419-0655

*Western Rockcastle Water Association
Western Rockcastle Water Association, Inc.
371 New Brodhead Road
P. O. Box 627
Mt. Vernon, KY 40456

*Mountain Water District
Mountain Water District
6332 Zebulon Highway
P. O. Box 3157
Pikeville, KY 41502-3157

*South Logan Water Association, Inc.
South Logan Water Association, Inc.
114 S Main Street
Adairville, KY 42202

*U. S. 60 Water District of Shelby an
U. S. 60 Water District of Shelby and Franklin
4596 Bagdad Road
P. O. Box 97
Bagdad, KY 40003

*Reid Village Water District
Reid Village Water District
903 Winchester Road
P. O. Box 610
Mt. Sterling, KY 40353

*Southern Madison Water District
Southern Madison Water District
207 North Dogwood Drive
P. O. Box 220
Berea, KY 40403

*Peaks Mill Water District
Peaks Mill Water District
7165 US 127 North
Frankfort, KY 40601

*Fern Lake Company
Fern Lake Company
34 Appolo Fuels Road
Middlesboro, KY 40965

*South 641 Water District
South 641 Water District
207 Main Street
P. O. Box 126
Hazel, KY 42047

*Parksville Water District
Parksville Water District
10711 Lebanon Road
P. O. Box 9
Parksville, KY 40464

*South Eastern Water Association, Inc
South Eastern Water Association, Inc.
147 East Somerset Church Road
Somerset, KY 42503

*South Hopkins Water District
South Hopkins Water District
129 South Main Street
P. O. Box 487
Dawson Springs, KY 42408

*Rebecca W Goodman
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Hardin County Water District #1
Hardin County Water District #1
1400 Rogersville Road
Radcliff, KY 40159-0489

*Water Service Corporation of Kentuck
Water Service Corporation of Kentucky
2335 Sanders Road
Northbrook, IL 60062-6196

*Rowan Water, Inc.
Rowan Water, Inc.
1765 Christy Creek Road
Morehead, KY 40351

*Sandy Hook Water District
Sandy Hook Water District
1000 Howard's Creek Road
P. O. Box 726
Sandy Hook, KY 41171

*Garrard County Water Association, In
Garrard County Water Association, Inc.
315 Lexington Road
P. O. Box 670
Lancaster, KY 40444

*Oldham County Water District
Oldham County Water District
2160 Spencer Court
La Grange, KY 40031

*Crittenden-Livingston County Water D
Crittenden-Livingston County Water District
620 East Main Street
P. O. Box 495
Salem, KY 42078

*Todd County Water District
Todd County Water District
2201 New Highway 68 West
P. O. Box 520
Elkton, KY 42220

*Trimble County Water District #1
Trimble County Water District #1
P. O. Box 63
34 E Morgan Drive
Bedford, KY 40006-0063

*Webster County Water District
Webster County Water District
478 US HWY 41-A South
P. O. Box 320
Dixon, KY 42409-0320

*Western Lewis-Rectorville Water and
Western Lewis-Rectorville Water and Gas District
8044 KY 3161
Maysville, KY 41056-9344

*Cannonsburg Water District
Cannonsburg Water District
1606 Cannonsburg Road
Ashland, KY 41102

*East Clark County Water District
East Clark County Water District
118 Hopkins Lane
P. O. Box 112
Winchester, KY 40391

*Western Mason County Water District
Western Mason County Water District
2573 Mary Ingles Highway
P. O. Box 49
Dover, KY 41034-0049

*Union County Water District
Union County Water District
409 North Court Street
P. O. Box 146
Morganfield, KY 42437

*West McCracken County Water District
West McCracken County Water District
8020 Ogden Landing Road
West Paducah, KY 42086

*Western Pulaski County Water District
Western Pulaski County Water District
2128 West Highway 80
Somerset, KY 42503

*Adair County Water District
Adair County Water District
109 Grant Lane
P. O. Box 567
Columbia, KY 42728

*Western Fleming County Water District
Western Fleming County Water District
1500 Ewing Road
P. O. Box 16
Ewing, KY 41039

*Ohio County Water District
Ohio County Water District
124 E Washington Street
P. O. Box 207
Hartford, KY 42347

*West Daviess County Water District
West Daviess County Water District
3400 Bittel Road
Owensboro, KY 42301

*North Manchester Water Association,
North Manchester Water Association, Inc.
7362 N Highway 421
Manchester, KY 40962

*Southeast Daviess County Water Distr
Southeast Daviess County Water District
3400 Bittel Road
Owensboro, KY 42301

*East Pendleton Water District
East Pendleton Water District
601 Woodson Road
Falmouth, KY 41040

*Whitley County Water District #1
Whitley County Water District #1
19 S Highway 25W
Williamsburg, KY 40769