

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF GRAYSON)
COUNTY WATER DISTRICT FOR A)
DEVIATION FROM METER TESTING) CASE NO. 2019-00115
REQUIREMENTS OF 807 KAR 5:066,)
SECTION 16(1))**

SUPPLEMENTAL RESPONSE OF

GRAYSON COUNTY WATER DISTRICT

TO

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

DATED JULY 15, 2019

FILED: August 30, 2019

GRAYSON COUNTY WATER DISTRICT

CASE NO. 2019-00115

Supplemental Response to Commission Staff's First Request for Information

Question No. 2(d)

Responding Witness: Kevin Shaw & Legal Counsel

Q-2. Refer to the application, paragraph 13(d) and Exhibit 1, sample testing plan, in which it states that Badger, the meter manufacturer, represents that Grayson District's meters will remain accurate for 15 years.

d. Provide any other information Grayson District contends support its contention that its 5/8- x 3/4-inch Badger meters will remain accurate for 15 years.

A-2. Original Response:

d. Attached are test results for all of the 2005 meters that were removed from service and tested in 2018.¹ The results provide further support that Grayson District's Badger meters remain extremely accurate at 13 years of age. As described in the Plan, Grayson District selected a sample pursuant to the ANSI Standard and reported the sample test results as Appendix A-1 of its Plan. The attached test results include the meters that were selected as the sample.

Supplemental Response:

d. Attached are test results for all of the 2005 meters that were removed from service and tested in 2018.² As Grayson District explained in its Motion to Substitute Exhibit filed August 28, 2019, when preparing its response to the Commission Staff's Second Request for Information, Grayson District discovered that a few Sensus meters installed in 2005 had been miscoded as Badger meters. Grayson District has removed the miscoded meters from the attached test results.

The results provide further support that Grayson District's Badger meters remain extremely accurate at 13 years of age. As described in the Plan, Grayson District selected a sample pursuant to the ANSI Standard and reported the sample test results as Appendix A-1 of its Plan. The attached test results include the meters that were selected as the sample.

¹ If approved, Grayson District's Plan provides that Grayson District will annually sample test all 5/8- x 3/4-inch Badger meters that have been in service at least 13 years. Thus, in the future, all meters will not be removed from service and test results of all meters will not be available until the meters reach 15 years of age.

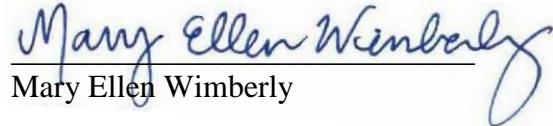
² If approved, Grayson District's Plan provides that Grayson District will annually sample test all 5/8- x 3/4-inch Badger meters that have been in service at least 13 years. Thus, in the future, all meters will not be removed from service and test results of all meters will not be available until the meters reach 15 years of age.

Meter	Manufacturer	Model	RemovedDate	TestDate	LowResults	MedResults	HighResults	Reading
29584552	Badger	25 ADE	9/13/2018	10/31/2018	98.0	100.0	99.6	144165.7
29584543	Badger	25 ADE	1/3/2019	1/4/2019	98.0	102.0	99.7	357417.0
29584540	Badger	25 ADE	1/3/2019	1/4/2019	97.0	101.0	98.7	785880.6
29584542	Badger	25 ADE	1/3/2019	1/4/2019	97.0	101.0	99.3	640670.3
29584545	Badger	25 ADE	1/3/2019	1/4/2019	97.0	100.0	99.0	1097469.3
29584544	Badger	25 ADE	1/3/2019	1/4/2019	97.0	101.0	99.2	1100162.2
29584536	Badger	25 ADE	1/3/2019	1/4/2019	95.0	101.0	98.5	639739.6
29584532	Badger	25 ADE	1/7/2019	1/8/2019	99.0	100.0	99.2	360072.1
29584565	Badger	25 ADE	1/8/2019	1/8/2019	99.0	99.0	99.3	624340.8
29584528	Badger	25 ADE	1/7/2019	1/8/2019	99.0	100.0	99.2	433160.7
29584530	Badger	25 ADE	1/7/2019	1/8/2019	96.0	102.0	98.8	1230929.0
29584568	Badger	25 ADE	1/7/2019	1/8/2019	98.0	101.0	99.7	649686.2
29584553	Badger	25 ADE	1/7/2019	1/8/2019	100.0	100.0	99.6	496769.3
29584556	Badger	25 ADE	1/8/2019	1/8/2019	98.0	101.0	98.8	299902.8
29584566	Badger	25 ADE	1/8/2019	1/8/2019	98.0	101.0	98.7	882681.5
29584537	Badger	25 ADE	1/8/2019	1/8/2019	95.0	101.0	98.7	1657087.2
29584535	Badger	25 ADE	1/8/2019	1/8/2019	95.0	100.0	98.7	853581.1
29584498	Badger	25 ADE	1/3/2019	1/9/2019	98.0	100.0	98.9	411341.6
29584501	Badger	25 ADE	1/3/2019	1/9/2019	99.0	100.0	99.2	956846.1
29584539	Badger	25 ADE	1/3/2019	1/9/2019	100.0	101.0	100.0	106888.4
29584555	Badger	25 ADE	1/7/2019	1/9/2019	98.0	102.0	99.5	642177.6
29584502	Badger	25 ADE	1/7/2019	1/9/2019	99.0	101.0	99.7	618301.0
29584499	Badger	25 ADE	1/7/2019	1/9/2019	98.0	101.0	98.8	270186.2
29584564	Badger	25 ADE	1/9/2019	1/9/2019	98.0	101.0	99.7	932290.7
29584534	Badger	25 ADE	1/9/2019	1/9/2019	99.0	100.0	99.0	635012.3
29584567	Badger	25 ADE	1/9/2019	1/9/2019	99.0	100.0	99.0	504557.6
29584500*	Badger	25 ADE	9/19/2018	1/9/2019	98.0	100.0	89.7	455160.7

*This meter was part of a bench that was not tested correctly. The operator had scrapped the meter before the mistake was caught. With the exception of this meter, the entire bench was retested.

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Grayson County Water District's August 30, 2019 electronic filing of this Supplemental Response is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on August 30, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that one copy in paper medium of this Supplemental Response will be delivered to the Commission within two business days.



Mary Ellen Wimberly