

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC SOUTHERN WATER &)	CASE NO.
SEWER DISTRICT METER REPLACEMENT)	
SURCHARGE MONITORING)	2020-121

**Southern Water & Sewer District's Response
to PSC Staff's 11TH Request for Information**

Comes now Southern Water & Sewer District ("Southern") and provides the following responses to the KY Public Service Commission Staff's Eleventh Request for Information.

1. Refer to the Annual Progress Report filed on April 10, 2023, unnumbered page 6 of 15.
 - a. Explain the analysis charge fees charged by Peoples Bank. Include in your response the first date this fee was charged, the reason the bank gives for charging this fee, the total amount charged in the April 2022 through March 31, 2023, reporting period, and any other information available to explain why this fee was incurred and what Southern District is doing to avoid excessive fees.
 - i. ANSWER: See attached Exhibit # 1. Answer provided by Kirk Frazee with Peoples Bank.

- ii. ANSWER: Both Paula Burke, office manager, and Steven Bailey, Attorney for Southern, have reached out to Peoples Bank to inquire how to reduce or avoid these fees charged by Peoples Bank. Peoples Bank has yet to respond to these emails. Answered by Steven Bailey and Paula Burke.
 - b. Explain the service charge fees charged by Peoples Bank during the reporting period of April 2022 through March 31, 2023; state whether these fees have increased during this reporting period.
 - i. ANSWER: See attached Exhibit # 1. Answer provided by Kirk Frazee with Peoples Bank.
- 2. Refer to the Annual Progress Report filed on April 10, 2023, unnumbered page 7 of 15.
 - a. Explain what a sizeable portion means in this context, and state how many AMR meters Southern District has discovered are zero read.
 - i. ANSWER: Approximately 50 meters were found dead in September 2022. Answer Provided by Randy Conley.
 - b. Provide Southern District's cost to ship malfunctioning meters to the manufacturer during the April 2022 through March 31, 2023, reporting period.
 - i. ANSWER: The cost to ship each meter is \$6.40 per register and \$14.50 per meter bottom. Answer provided by Randy Conley.
 - c. Provide an estimate of the cost to ship any remaining malfunctioning meters.

i. ANSWER: From April of 2022 to March 31, 2023, Southern District pursued two separate cases of water theft. One Defendant was indicted. The location of the alleged water theft was at the home of the mother of this Defendant. The Court found that the state could not prove that it was this Defendant that was stealing water and dismissed the charges. Southern has not had any additional issues with this Defendant or at this property since this prosecution.

The other person was indicted and is currently in jail on drug charges as well as the theft of services charges and his case is still pending.

Answer provided by Randy Conley.

b. For each case of reported water theft, state the result of the report to the county attorney; include in your response a statement clarifying whether anyone was prosecuted in each instance.

i. ANSWER: See response to 3a. Answer provided by Randy Conley.

c. Identify locations in Southern District's system that Southern District has identified as sources of unaccounted for water loss.

i. ANSWER: Southern District has identified the Mudd Creek area around the entrance to Branham's Creek as one source of unaccounted for water loss. This area is very wet and swampy. This area has tested positive for cholorine which leads Southern to believe that the accumulation of water in this area is from our water lines. Southern has had a difficult time attempting to locate any leaks in this area due

to the fact that heavy equipment keeps sinking and getting stuck in this soggy area.

Mudd Creek at the mouth of Toler.

Tinker Fork has had several leaks fixed but as soon as one leak is fixed the increase in pressure causes another leak. The water lines in Tinker Fork were installed incorrectly and with improper materials and thus this area is constantly leaking.

Wayland. The 2-inch galvanized lines in Wayland leak.

Spurlock main water line before the tank. Most of this line is hammered into rock and it is difficult to pinpoint all of the leaks.

Left Fork of Toler. This area was installed with thin wall pipe that looks like vent piping. Every service line in this area needs to be replaced.

While repairing leaks, Southern has discovered many band clamps that have been used in the past to hastily and cheaply repair leaks.

When Southern finds these band aid fixes to lines, we attempt to dig up the entire line and replace it with new more appropriate lines.

Answer provided by Randy Conley.

- d. For each location provided above, state whether Southern District has developed a plan to address the problem, and if so, provide a description of the plan.

- i. ANSWER: Southern District is constantly seeking grants and other funding sources to replace deteriorating water lines. Currently, the Wayland to Lackey water line replacement is approximately 80% complete. This should address much of the issues around the Wayland area. Southern District has applied for several other funding sources to address unaccounted for water loss, including KY WRIS Project Profiles WX21071009, WX21071013, WX21071020. WX21071730 is currently in progress. While awaiting funding to replace faulty lines, Southern has been installing master meters to aid in our leak detection. Southern is replacing leaking service lines, in house, as we find them. Many of these leaky water lines had been previously repaired with band clamps in several places. Southern has been replacing these hastily repaired water lines in house with Southern Employees. The lack of funding and personnel is a huge obstacle in Southern's efforts to replace aging, leaking water lines. Southern has submitted an application for funding to replace water lines from the mouth of Toler to the Pressure Release Valve in an attempt to relocate the main water line away from the swampy area discussed above. Southern has submitted another funding application to replace water lines on the Left Fork of Toler. Additionally, Southern has applied for funding to replace water lines on Tinker Fork. Southern intends on applying for funding to replace

the water lines from John M. Stumbo School to the Mouth of Branham's Creek which will replace the water line in the swampy area around the Mouth of Branham's Creek once the new KY 680 road is completed. Answered by Randy Conley.

4. Refer to the Annual Progress Report filed on April 10, 2023, at unnumbered page 14 of 15.

a. Confirm that a total of four out of the proposed ten master meters have been installed.

i. ANSWER: All 10 pits for the placement of the master meters have been installed at this time. One master meter is currently in use.

Answered by Randy Conley.

b. Explain why three of the master meters are installed but are not operational.

i. ANSWER: Three additional master meters have telemetry panels and the meters installed. These three meters would have been in use, but the factory representative must perform the start up to make them operational. The factory representative is an employee of the Master Meter Vendor, Wascon, Inc. Recently, the factory representative that does the start-up has been diagnosed with cancer and has undergone a surgical procedure. He is currently convalescing but is expected to return to work soon. Southern plans on having the remaining 6 Master Meters built and installed in the next month and hopefully have the

factory representative come and do the start-up and have all 10 master meters running by the end of June of 2023.

Answered by Randy Conley.

- c. Provide the date Southern District expects these three master meters to become operational.
 - i. ANSWER: Southern intends to have all 10 master meters in operation by the end of June 2023. The main obstacle in getting the three master meters operational is getting the factory representative to start up said master meters. Answered by Randy Conley.
- d. State whether Southern District will incur any additional expense in making these three master meters operational.
 - i. ANSWER: No additional cost is expected to make these three master meters operational. Southern intends on purchasing and installing transducers onto each master meter site to give pressure readings to aid in the detection of leaks. Answered by Randy Conley.
- e. State whether the one installed and operational master meter has provided Southern with any useful data in locating leaks to the system.
 - i. ANSWER: The one operational master meter has not provided any useful data to date but Southern is monitoring and compiling the data provided by this master meter for later use. Answered by Randy Conley.

5. Provide “Appendix” to an Order of the Kentucky Public Service Commission in “Case No. 2020-00121” for the September 2022 reporting period.

i. ANSWER: See attached Exhibit # 4. Answered by Paula Burke.

6. Provide the following information in Excel format with all formulas, rows and columns fully accessible and unprotected.

i. ANSWER: See attached Excel worksheet/Exhibit # 5. Answered by Jeff Reed.

CERTIFICATION

These responses are true and accurate to the best of preparer’s knowledge, information and belief formed after reasonable inquiry.

Respectfully Submitted on May 18, 2023, by;

/s/ Steven Bailey
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