

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

PSC Case 2020-121

In Re Matter of: ELECTRONIC SOUTHERN WATER AND SEWER  
DISTRICT METER REPLACEMENT SURCHARGE MONITORING

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MOTION FOR APPROVAL TO PAY INVOICE

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Comes Southern Water and Sewer District “Southern”, by and through counsel, and hereby requests PSC approval to pay for an additional 50 AMR water meters with the proceeds of the Surcharge;

As the PSC is aware, Southern, along with many other water utilities, has encountered issues with the accuracy and reliability of the new “RG3” AMR water meters. Since the end of 2022, Southern has averaged pulling around 50 of these new AMR water meters from service each month in order to mail these faulty meters back to the manufacturer for repair.

Due to these workmanship issues with the meters, Southern lacks a sufficient amount of AMR water meter inventory to replace the faulty meters which have been pulled from service for repair. Southern has reached out telephonically, via email and via registered mail to the manufacturer (RG3) to attempt to reach some type of resolution to this matter with no success.

In order to service our customers while these meters are being repaired, Southern has ordered and received an additional 50 “RG3” AMR water meters to be used to replace the faulty meters while said faulty meters are being repaired.

WHEREFORE, Southern hereby requests that the PSC grant permission to pay the attached invoice for the purchase of an additional 50 water meters from the proceeds of the Meter Replacement Surcharge.

Respectfully Submitted Electronically on June 12, 2023,

/s/ Steven Bailey \_\_\_\_\_  
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