

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC FARMDALE WATER)
DISTRICT'S UNACCOUNTED-FOR) CASE NO. 2020-00217
WATER LOSS REDUCTION PLAN,)
SURCHARGE AND MONITORING)

RESPONSE OF
FARMDALE WATER DISTRICT
TO
COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
DATED NOVEMBER 21, 2023

FILED: DECEMBER 8, 2023

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**RESPONSE OF FARMDALE WATER DISTRICT
TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION**

Comes Farmdale Water District ("Farmdale" or "Farmdale District") for its Response to Commission Staff's Second Request for Information, and states as shown on the following pages.



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**CERTIFICATION OF RESPONSE OF FARMDALE
WATER DISTRICT TO COMMISSION STAFF'S
SECOND REQUEST FOR INFORMATION**

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

Date: December 8, 2023



Randall S. Wooldridge, Chairman
Farmdale Water District

CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on December 8, 2023; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



Damon R. Talley

Counsel for Farmdale Water District

FARMDALE WATER DISTRICT

CASE NO. 2020-00217

Response to Commission Staff's Second Request for Information

Question No. 1

Responding Witness: Randall S. Wooldridge, Chairman

Q-1. Refer to the Informal Conference Memorandum filed on April 5, 2023. Explain the circumstances that have led to the delay in filing the supplement to the Qualified Infrastructure Improvement Plan (QIIP) which was to provide further detail regarding the District's plan for use of the surcharge funds.

A-1. The primary reasons for the delay in preparing and filing the Qualified Infrastructure Improvement Plan ("QIIP") are as follows:

A. Farmdale District's former Water Manager, Jamie Roberts, who attended the Informal Conference held on March 31, 2023, resigned on July 21, 2023. He "dropped the ball" on a lot of important matters, including his failure to implement some of the recommendations from the representatives of Kentucky Rural Water Association ("KRWA") concerning leak detection, isolation and location of the leaks, and repairing the leaks in a timely manner. He was convinced that Farmdale District's 11-year-old water meters were running "slow" and that the "slow" meters were the biggest source of Farmdale's water loss. He refused to consider that the high water loss was probably caused by a combination of factors, because this would mean more work for him to do.

B. Farmdale's current Board members mistakenly relied upon representations made by its former Water Manager concerning the primary causes of its extremely high water loss.

- C. Over the past few years, Farmdale District has not had a clear prioritization strategy for its water loss reduction projects.
- D. Based upon the advice and strong opinion of its former Water Manager, Farmdale District's current Board of Commissioners thought that replacing all its meters would be a relatively simple and efficient way to reduce its water loss. This opinion has now changed because Farmdale District's current Water Manager has been testing more and more of its meters. The test results show that almost all of its 11-year-old meters are measuring within the accepted limits of accuracy and do not need replacing. Thus, replacing these meters will **not** have a substantial impact on reducing the water loss.
- E. Farmdale District has recently tasked its consulting engineer, Jeff Reynolds of HMB Professional Engineers ("HMB"), with analyzing Farmdale District's distribution system and compiling a list of recommended projects to undertake. Mr. Reynolds's initial impression is that Farmdale District needs to add more zone meters or place them in more strategic locations. Also, the customer accounts associated with the area where each zone meter is located need to be grouped together with this particular zone meter. This will make it easier to determine the normal amount of usage in each specific area or zone and whether a specific zone has more water entering this zone than is being consumed by the customers in this specific zone.
- F. Farmdale District candidly admits that it has not placed the proper priority on having its Water Manager, consulting engineer, and attorney prepare the QIIP and Water Loss Reduction Plan. We now intend to do so.

FARMDALE WATER DISTRICT

CASE NO. 2020-00217

Response to Commission Staff's Second Request for Information

Question No. 2

**Responding Witnesses: Randall S. Wooldridge and
Jeff Reynolds, P.E., HMB Professional Engineers, Inc.**

Q-2. Provide a date by which the supplement to the QIIP will be filed.

A-2. Farmdale District reasonably believes that it can prepare and file the QIIP and Water Loss Reduction Plan by **February 29, 2024**. HMB should have its assessment and recommendations in place by the end of January. Farmdale District's Board can then review and comment on HMB's recommendations at its February Board meeting. HMB will then need to make any necessary revisions and prepare cost estimates for the various projects which the Board has prioritized. This will enable Farmdale District's attorney to finalize the QIIP and Water Loss Reduction Plan by February 29, 2024.