## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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

## **NOTICE OF FILING**

Pursuant to Ordering paragraph 1 of the Kentucky Public Service Commission's (the "Commission") February 10, 2023 Order in Case No. 2020-00217, Farmdale Water District ("Farmdale District") gives notice of filing its Qualified Infrastructure Improvement Plan ("QIIP").

It should be noted that Farmdale's proposed QIIP is still in draft form because it has not yet been approved by Farmdale District's Board of Commissioners. In addition, it is a combination QIIP and Water Loss Reduction Plan (the "Plan"). A few years ago (2019-2021), Kentucky Rural Water Association ("KRWA") employees spent considerable time at Farmdale working with the former Manager of Farmdale District. At that time KRWA provided technical assistance and did the following: (a) isolated and located leaks; (2) separated Farmdale District's distribution system into four (4) distinct zones; (3) analyzed Billing and Usage Data; and (4) made other recommendations, including some of those included in the draft Plan. Some of KRWA's recommendations have already been implemented.

Unfortunately, none of KRWA's findings and recommendations were memorialized and no Standard Operating Procedure was prepared. The KRWA employee who did most of the "hands-on" work at Farmdale has retired. Recently, Farmdale District requested KRWA to return and assist Farmdale District's current Manager and current employees in isolating and locating leaks.

Like most small water utilities, Farmdale District does not have an Asset Management Plan (the "AMP"). If it already had an AMP in place, it would have been much easier for Farmdale District to prepare the QIIP.

Farmdale District's priorities for capital improvements to reduce its high unaccounted-for water loss has changed over the past few years. The top priority, however, did not change. In 2022, Farmdale District completed the transfer of the customer meters from the old 3-inch diameter water line to the newer 6-inch diameter water line along South Benson Road. Originally, replacing the customer meters was not one of Farmdale District's top priorities. Because of meter failures and test results that show that many of the customer meters are measuring "slow," meter replacement has now become a top priority. Farmdale District proposes to utilize as much of the Water Loss Reduction Surcharge funds as possible to replace it 11 year-old meters.

Dated: February 21, 2023 Respectfully submitted,

Felisa S. Moore

Stoll Keenon Ogden PLLC 300 West

Vine Street, Suite 2100

Lexington, Kentucky 40507

Telephone: (859) 231-3000

felisa.moore@skofirm.com

Damon R. Talley Stoll Keenon Ogden PLLC P.O. Box 150

Hodgenville, KY 42748-0150 Telephone: (270) 358-3187

Fax: (270)358-9560

damon.talley@skofirm.com

Counsel for Farmdale Water District

## **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, and the Public Service Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was transmitted to the Public Service Commission on February 21, 2023, and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

Counsel for Farmdale Water District

Felisa S. Moore