

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**SUPPLEMENT TO MOTION FOR ALTERNATE USE OF
SURCHARGE FUNDS**

By and through the undersigned counsel, Farmdale Water District (“Farmdale District”) moves the Commission to approve the purchase of five (5) 1-inch T-10 Pro-Coder Neptune water meters and to grant it authority to purchase five (5) additional 1-inch T-10 Pro-Coder Neptune water meters to replace existing 1-inch meters that are older than 10 years old and out of compliance with meter-testing regulations. In support of its Supplement to its Motion Farmdale District states:

1. On May 21, 2025, the Farmdale District filed a Motion for Alternate Use of Surcharge Funds and explained that it had discovered it had 1,405 meters in its system that were out of compliance with meter-testing regulations and that needed to be replaced.

2. Counsel for Farmdale District has just learned that eight (8) 1-inch meters are included in the 1,405 total, and that Farmdale District has ordered 10 1-inch T-10 Pro-Coder Neptune meters. Eight of the new meters will be immediately placed into service to replace the existing meters that need to be replaced, and two meters will be kept in inventory and used for new service installations or future meter replacement.

3. The 1-inch meters cost \$418 each and the total cost for the 10 1-inch meters is **\$4,180**.

4. Farmdale District has received five (5) of the 1-inch meters and has used Surcharge Funds to pay the \$2,090 invoice, which is attached as **Attachment 1**.

5. Farmdale District expects to receive delivery of the remaining five (5) meters within the next 30 days.

6. Farmdale District is aggressively pursuing completion of meter replacement by August 31, 2025, and needs the 1-inch meters to do so.

7. A misunderstanding of the authority the Commission had granted Farmdale District to use its Surcharge Funds in relation to meter replacement was the reason for the premature use of the funds to pay the \$2,090 invoice for the five (5) 1-inch meters.

WHEREFORE, on the basis of the forgoing, Farmdale District respectfully requests that the Commission accept Farmdale District's use of Surcharge Funds to purchase five (5) 1-inch meters at a cost of \$2,900, and grant Farmdale District authority to purchase five (5) additional 1-inch meters using Surcharge Funds, for a total expenditure of \$4,180 for 10 1-inch meters. Additionally, Farmdale District moves for authority to use the remainder of its Surcharge Funds as partial payment for the transceivers Farmdale is purchasing through the Frankfort Plant Board.

Respectfully submitted,

/s/ Tina C. Frederick

Tina C. Frederick
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
Telephone: (859) 231-3951
Fax: (859) 259-3597
tina.frederick@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

Dated: July 7, 2025

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 July 7, 2025 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding

/s/Tina C. Frederick

Counsel for Farmdale Water District

Attachment 1
NECO Invoice
Five 1-inch Neptune Meters



NECO Water
12125 Ellington Court
Cincinnati, OH, 45249

Invoice

Reference No.: 006605
Date: 30-May-2025
Due Date: 29-Jun-2025
Customer ID: FAR020
Currency: USD

ATTENTION: WE HAVE MOVED!

**PLEASE REMIT PAYMENTS TO:
12125 ELLINGTON CT.
CINCINNATI, OH 45249**

SOLD TO:
FARMDALE WATER
100 HIGHWOOD DRIVE
FRANKFORT KY 40601
United States of America

SHIP TO:
FARMDALE WATER
100 HIGHWOOD DRIVE
FRANKFORT KY 40601
United States of America

CUSTOMER REF. NUMBER		TERMS	CONTACT			
CRALPH0425		Net 30 day				
SO TYPE	SO NUMBER	SHIPMENT NUMBER		CUSTOMER P.O. NO.		
SO	003773	004763		CRALPH0425		
NO.	ITEM	QTY.	UOM	UNIT PRICE	DISC.	EXTENDED PRICE
1	ED2F11RPCG11SA91: 1 T-10 CI 302 P-CODER TOUCH COUPLER PIT GAL	5.00	EA	418.00	0%	2,090.00
2	Freight ShipVia UPS	1.00		0.00	0%	0.00



PAID

6-17-25

CHK# 1006

Sales Total: 2,090.00
Tax Total: 0.00
Total (USD): 2,090.00