East Logan Water District

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"We Stand Behind Every Drop"

TTY: (800) 648-6056

August 15, 2020

Ms. Erin Donges, Utility Regulatory & Safety Investigator KY Public Service Commission PO Box 615 Frankfort, KY 40602-0615

Re: Water loss - East Logan Water District (Logan County)

Dear Ms. Donges,

East Logan Water District has seen an increase in water loss averaging 2 to 2.5% per year since 2015. I would like to explain a little about our District. It is my understanding that an independent contractor managed ELWD for the approximate 35 years prior to 2016. I was hired in as manager in training in the beginning of 2015. The plan was to learn as much as possible from Mr. Hanks that year as he was scheduled to continue managing the District through 2015. Nothing goes as planned. He actually quit in September of 2015. His two employees who did the District's work did not stay on with ELWD. ELWD had no direct employees, as everything was managed through the contractor. Mr. Hanks construction company had even installed some of the water lines over the years, so when he left, a vast working knowledge of the system went with him.

ELWD has approximately 300 miles of waterline, bordering 3 counties. We now service about 3200 active customers. We may not be considered a large system, but it is a lot of territory to learn and maintain, especially when you are learning on your own. We have struggled to recruit dedicated employees that will stay long term. We have had four Class II Distribution Operators quit since 2015 and we have had at least 6 field workers leave for other employment. The District loses forward momentum every time field workers are replaced.

Water loss has been an ongoing issue for ELWD for many years. Out of curiosity, I looked back over the annual reports for ELWD for the last 10 years. Only one year was the water loss reported to be below 15% from 2010 to 2015. When Mr. Hanks left in 2015, water loss was reported at 19% for that year, and we have continued to struggle with it since then.

Equal Opportunity Provider and Employer

The things we have done to combat water loss since 2015 include: (These are steps we've taken, but please remember we have had to start over when we've had staff turnover)

We've contacted KRWA to give training/insight on leak detection on a few occasions

RCAP has given guidance in some areas

We've tried to dedicate as much time as possible to sounding for leaks

- We've tried to hire additional employees dedicated strictly to leak detection
- We always check zero usage accounts and investigate for possible dead meters monthly when we read read meters/do monthly billing
- We have looked into replacing/upgrading our SCADA system as there are still sections unmetered, but this has has not yet happened.

Over the years, we have found many, many service lines that have had multiple repairs to them and have found them to be a liability. It is our policy now to replace any service line from main to meter if it is known to already have at least one repair to it. This should help by not having to re-visit same site leaks.

We are learning from the past, and past mistakes, but are truly focusing on the future. Even though our crew are relatively new, I have confidence and respect for our current field workers, and truly believe they are on the right path. These workers are dedicated, willing and even eager to learn daily about our system. Willingness to learn is as imperative as being given the time to learn, and we truly have a crew that want to make a difference. I believe this is evident in the progress we have made with water loss this year. I am enclosing the monthly water loss reports for 2020. Since January, we have decreased water loss every month. This is a very good start and I believe we will make more progress before the end of the year.

We are actively becoming more familiar with our SCADA system and are using it to our advantage in finding leaks. We realize finding leaks, new large leaks, as quickly as possible is essential to maintaining customer confidence as well as a well-run system, and we have had much success with this in the last couple months. I am enclosing an example of the time it took to find and repair a very large leak that started in the middle of the night recently.

We have recently purchased a new sounding device and the plan is to again start going meter to meter in sections, starting with the higher loss areas. This was interrupted with staff turnover earlier this year.

We do understand the waste associated with unsold purchased water, and it is our goal to reduce this waste as quickly as possible. We believe we are on the right path and we believe we have the necessary workers to make a difference. We will continue to reach out to KRWA with questions and training when possible, and we welcome suggestions.

Respectfully,

Linda Alexander, Manger East Logan Water District