

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

ELECTRONIC BEECH GROVE WATER)
SYSTEM, INC. FOR WATER LOSS)
REDUCTION PLAN, SURCHARGE AND)
MONITORING) CASE NO. 2022-00318

BEECHGROVE WATER SYSTEM, INC.'S
RESPONSES TO COMMISSION STAFF'S
FIRST REQUEST FOR INFORMATION

BEECH GROVE WATER SYSTEM, INC. (Beech Grove) responds to COMMISSION STAFF'S first request for information as follows:

1. Refer to the Monthly Water Loss Report for October 2022 filed on April 4, 2023. Explain the factors contributing to the reduction of Beech Grove Water's water loss percentage to 11.88 percent for October 2022, given that Beech Grove Water reported a 22.13 percent water loss for the year ending December 31, 2021.

RESPONSE: The October water loss previously reported was inaccurate. The correct number is 13.33%. Corrective pages and pages showing the error are attached.

2. Refer to the Monthly Water Loss Report for January 2023, filed on April 6, 2023.

a. Confirm that the water loss percentage of 5.88 percent recorded for January 2023 is accurate.

RESPONSE: **January water loss previously reported was inaccurate. The correct number is 16.81%. Corrective pages and pages showing the error are attached.**

b. If the accuracy of this figure cannot be confirmed, provide the water loss percentage for January 2023.

RESPONSE: **See response above.**

3. Refer to the Monthly Water Loss Report for February 2023, filed April 6, 2023.

a. State why this form indicates it is for January 2023.

RESPONSE: **It was a carryover error from using the prior month as a template.**

b. Confirm that the water loss percentage of 0.10 percent is accurate for February 2023.

RESPONSE: **The February water loss previously reported was inaccurate. The correct number is 6.17%. Corrective pages and pages showing the error are attached.**

c. If the accuracy of this figure cannot be confirmed, provide the water loss percentage for February 2023.

RESPONSE: **See response above.**

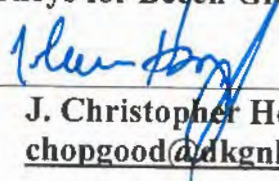
d. If the accuracy of the figure is confirmed, explain how this percentage of water loss is possible.

RESPONSE:

See response above.

DORSEY, GRAY, NORMENT & HOPGOOD
318 Second Street
Henderson, Kentucky 42420
(270) 826-3965 Telephone
(270) 826-6672 Telefax
Attorneys for Beech Grove Water System, Inc.

By



J. Christopher Hopgood
chopgood@dkgnlaw.com

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

ELECTRONIC BEECH GROVE
WATER SYSTEM, INC. UNACCOUNTED FOR
WATER LOSS, REDUCTION PLAN, SURCHARGE
AND MONITORING

CASE NO. 2022-00318

VERIFICATION

I hereby verify that the foregoing responses are true and correct to the best
of my knowledge and belief.

Sheila Murphy

Sheila Murphy
Beech Grove Water System, Inc.

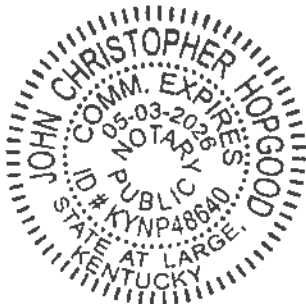
STATE OF KENTUCKY

COUNTY OF Henderson

The foregoing was subscribed and sworn to before me by Sheila Murphy,
Office Manager, Beech Grove Water Systems, Inc., this 18th day of May, 2023.

My commission expires 5-3-2026

(seal)



John Christopher Hopgood

Notary Public,
Notary Public ID#: KYNP48640

RESPONSE DATA REQUEST NO. 1

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility: Beech Grove Water System

For the Month of: October Year: 2022

LINE #	ITEM	GALLONS (917) (6) (10)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	-
3	Water Purchased	5,086
4	TOTAL PRODUCED AND PURCHASED	5,086
5		
6	WATER SALES	
7	Residential	4,307
8	Commercial	51
9	Industrial	-
10	Bulk Loading Stations	5
11	Wholesale	-
12	Public Authorities	-
13	Other Sales (explain)	-
14	TOTAL WATER SALES	4,363
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	-
18	Wastewater Plant	-
19	System Flushing	26
20	Fire Department	19
21	Other Usage (explain)	0
22	TOTAL OTHER WATER USED	45
23		
24	WATER LOSS	
25	Tank Overflows	-
26	Line Breaks	-
27	Line Leaks	-
28	Excavation Damages	-
29	Theft	-
30	Other Loss (explain) <u>unknown</u>	678
31	TOTAL WATER LOSS	678
32		
33	Note: Line 14 + Line 22 + Line 31 MUST Equal Line 4	
34		
35	WATER LOSS PERCENTAGE	
36	(Line 31 divided by Line 4)	13.33%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

For the Month of: Year:

LINE #	ITEM	GALLONS (CUMULATIVE)
--------	------	----------------------

1 WATER PRODUCED AND PURCHASED

2	Water Produced	
3	Water Purchased	4,999
4	TOTAL PRODUCED AND PURCHASED	4,999

miscalculated

6 WATER SALES

7	Residential	4,304
8	Commercial	51
9	Industrial	
10	Bulk Loading Stations	5
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain)	
14	TOTAL WATER SALES	4,360

miscalculated

16 OTHER WATER USED

17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	26
20	Fire Department	19
21	Other Usage (explain)	
22	TOTAL OTHER WATER USED	45

24 WATER LOSS

25	Tank Overflows	
26	Line Breaks	
27	Line Leaks	
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) <u>unknown</u>	594
31	TOTAL WATER LOSS	594

miscalculated

33 Note: Line 14 + Line 22 + Line 31 **MUST** Equal Line 4

35 WATER LOSS PERCENTAGE

36	(Line 31 divided by Line 4)	11.88%
----	-----------------------------	--------

Meter_SN	Read_Time	Read	Read_Unit	Flow
21061915	9/30/2022 23:59	6141088	GAL	
21061915	10/1/2022 23:59	6318659	GAL	177571
21061915	10/2/2022 23:59	6501529	GAL	182870
21061915	10/3/2022 23:59	6670038	GAL	168457
21061915	10/4/2022 23:59	6824291	GAL	154305
21061915	10/5/2022 16:14	6930041	GAL	105750
21061915	10/5/2022 23:59	6982450	GAL	52409
21061915	10/6/2022 7:10	7030955	GAL	48505
21061915	10/6/2022 23:59	7169293	GAL	138338
21061915	10/7/2022 23:59	7320646	GAL	151353
21061915	10/8/2022 23:59	7493028	GAL	172382
21061915	10/9/2022 23:59	7659838	GAL	166810
21061915	10/10/2022 23:59	7813087	GAL	153249
21061915	10/11/2022 23:59	7969093	GAL	156006
21061915	10/12/2022 23:59	8132187	GAL	163094
21061915	10/13/2022 23:59	8291636	GAL	159449
21061915	10/14/2022 23:59	8441307	GAL	149671
21061915	10/15/2022 23:59	8591712	GAL	150405
21061915	10/16/2022 23:59	8744903	GAL	153191
21061915	10/17/2022 23:59	8890906	GAL	146003
21061915	10/18/2022 23:59	9023486	GAL	132580
21061915	10/19/2022 23:59	9170213	GAL	146727
21061915	10/20/2022 23:59	9300363	GAL	130150
21061915	10/21/2022 23:59	9431127	GAL	130764
21061915	10/22/2022 23:59	9582427	GAL	151300
21061915	10/23/2022 23:59	9750229	GAL	167802
21061915	10/24/2022 23:59	9922775	GAL	172546
21061915	10/25/2022 23:59	10080933	GAL	158158
21061915	10/26/2022 23:59	10239586	GAL	158653
21061915	10/27/2022 23:59	10397304	GAL	157718
21061915	10/28/2022 23:59	10542058	GAL	144754
21061915	10/29/2022 11:59	10618276	GAL	76218
21061915	10/29/2022 23:59	10697465	GAL	79189
21061915	10/30/2022 12:51	10782292	GAL	84827
21061915	10/30/2022 23:59	10843366	GAL	61074
21061915	10/31/2022 23:59	10993630	GAL	150264
		4,852,542		4,852,542

Handerson
written

Davies Co 234,000 Gals

TOTAL Purchase
5086542

Beech Grove Water System
Usage and Charge by Customer Type

11/02/2022

Page: 1

<u>Reading Date</u>	<u>Customer Type</u>	<u>Usage</u>	<u>Charge</u>	
October 2022		0		1
October 2022	A	2,264,369	\$16,352.29	61
October 2022	B	4,800	\$0.00	1
October 2022	C	50,720	\$480.19	12
October 2022	N	950	\$0.00	1
October 2022	R	2,041,870	\$82,893.39	528
Total for: 10/2022		4,362,709	\$99,725.87	
Grand Total:		4,362,709	\$99,725.87	

RESPONSE DATA REQUEST NO. 2

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility: Beech Grove Water System

For the Month of: January Year: 2023

LINE #	ITEM	GALLONS (Mill (100's))
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	-
3	Water Purchased	5,733
4	TOTAL PRODUCED AND PURCHASED	5,733
5		
6	WATER SALES	
7	Residential	4,508
8	Commercial	253
9	Industrial	-
10	Bulk Loading Stations	3
11	Wholesale	-
12	Public Authorities	-
13	Other Sales (explain)	-
14	TOTAL WATER SALES	4,764
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	-
18	Wastewater Plant	-
19	System Flushing	-
20	Fire Department	5
21	Other Usage (explain)	0
22	TOTAL OTHER WATER USED	5
23		
24	WATER LOSS	
25	Tank Overflows	-
26	Line Breaks	-
27	Line Leaks	-
28	Excavation Damages	-
29	Theft	-
30	Other Loss (explain) <u>unknown</u>	964
31	TOTAL WATER LOSS	964
32		
33	Note: Line 14 + Line 22 + Line 31 MUST Equal Line 4	
34		
35	WATER LOSS PERCENTAGE	
36	(Line 31 divided by Line 4)	16.81%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility: BEECH GROVE WATER SYSTEM

For the Month of: January Year: 2023

LINE #	ITEM	GALLONS (3mi. #10's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	5,071
4	TOTAL PRODUCED AND PURCHASED	5,071
5		
6	WATER SALES	
7	Residential	4,512
8	Commercial	253
9	Industrial	
10	Bulk Loading Stations	3
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain)	
14	TOTAL WATER SALES	4,768
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	-
18	Wastewater Plant	-
19	System Flushing	-
20	Fire Department	5
21	Other Usage (explain) <u>unknown</u>	-
22	TOTAL OTHER WATER USED	5
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	
27	Line Leaks	
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) <u>UNKNOWN</u>	298
31	TOTAL WATER LOSS	298
32		
33	Note: Line 14 + Line 22 + Line 31 MUST Equal Line 4	
34		
35	WATER LOSS PERCENTAGE	
36	(Line 31 divided by Line 4)	5.88%

mis-calculated

mis-calculated

Meter_ID	Read_Time	Read	Flow
47681101	12/31/2022 23:59	20693561	171224
47681101	1/1/2023 23:59	20881700	188139
47681101	1/2/2023 23:59	21070499	188798
47681101	1/3/2023 23:59	21231752	161254
47681101	1/4/2023 23:59	21384966	153214
47681101	1/5/2023 23:59	21537829	152863
47681101	1/6/2023 23:59	21693498	155669
47681101	1/7/2023 23:59	21857272	163774
47681101	1/8/2023 23:59	22031850	174578
47681101	1/9/2023 23:59	22203698	171848
47681101	1/10/2023 23:59	22377076	173378
47681101	1/11/2023 23:59	22551699	174623
47681101	1/12/2023 23:59	22701521	149822
47681101	1/13/2023 12:10	22780685	74939
47681101	1/13/2023 23:59	22875665	99205
47681101	1/14/2023 23:59	23054300	178635
47681101	1/15/2023 23:59	23226623	172323
47681101	1/16/2023 23:10	23401109	140415
47681101	1/16/2023 23:59	23407887	40849
47681101	1/17/2023 23:59	23581610	173723
47681101	1/18/2023 23:59	23752781	171171
47681101	1/19/2023 23:59	23934590	181809
47681101	1/20/2023 23:59	24106132	171542
47681101	1/21/2023 23:59	24301907	195775
47681101	1/22/2023 23:59	24492312	190405
47681101	1/23/2023 23:59	24675742	183430
47681101	1/24/2023 16:14	24801313	125571
47681101	1/24/2023 23:59	24857469	56156
47681101	1/25/2023 23:33	25043891	157390
47681101	1/25/2023 23:59	25044212	30053
47681101	1/26/2023 23:59	25228354	183442
47681101	1/27/2023 23:59	25405744	177390
47681101	1/28/2023 23:59	25597130	191386
47681101	1/29/2023 23:59	25779043	181913
47681101	1/30/2023 16:14	25883867	104824
47681101	1/30/2023 23:59	25942077	58210
47681101	1/31/2023 1:35	25954051	11974
47681101	1/31/2023 23:59	26125391	171340
47681101	2/1/2023 23:59		
		5431830	5431830

41
733

Blender son

Beech Grove
Water System,
KY

Consumption

- All Cycle
- Cycle01

Consumption Detail	Consumption Total	Meter Detail	Profile Graph	Graph Options									
Expected Usage: All													
Search Parameters Account#: Name: Meter ID: Address:	Consumption Variables: Service Type All Period Type Last Month <input checked="" type="checkbox"/> Display Summary <input type="checkbox"/> Display Detail	Display/Export Rules <table style="width: 100%;"> <tr> <td></td> <td style="text-align: center;">Action</td> <td style="text-align: right;">By</td> </tr> <tr> <td>Rules Display</td> <td style="text-align: center;">Multiply</td> <td style="text-align: right;">10</td> </tr> <tr> <td>Export</td> <td style="text-align: center;">Multiply</td> <td style="text-align: right;">10</td> </tr> </table> <input type="checkbox"/> Apply Rules				Action	By	Rules Display	Multiply	10	Export	Multiply	10
	Action	By											
Rules Display	Multiply	10											
Export	Multiply	10											
Date Range Start 1/1/2023 End 1/31/2023 <input checked="" type="checkbox"/> Closest Reading	Group Code <input type="checkbox"/> Select All AG NFLO												
Search													
				Save As XLS PDF									
:7	Cycle	Route	Total Route	Total Cycle									
01	000001	640639											
01	000002	307780											
01	000003	2020787											
01	000004	896610											
01	000005	159380											
01	MASTER	301000											
				4326196									
Total Consumption of Cycles/Routes:				4326196									
Processing time: 48 Seconds													

*DAVIES
CO
301,000*

Beech Grove Water System
Usage and Charge by Customer Type

02/05/2023

Page: 1

<u>Reading Date</u>	<u>Customer Type</u>	<u>Usage</u>	<u>Charge</u>	
January 2023	✓ A	2,305,388 ✓	\$16,685.69	61
January 2023	B	3,200	\$0.00	1
January 2023	C	253,040	\$1,838.66	12
January 2023	✓ N	1,080 ✓	\$0.00	1
January 2023	✓ R	2,201,270 ✓	\$20,764.47	519
Total for: 1/2023		4,763,978	\$39,288.82	
Grand Total:		4,763,978	\$39,288.82	

RESPONSE DATA REQUEST NO. 3

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

For the Month of: Year:

LINE #	ITEM	GALLONS (or Meters)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	-
3	Water Purchased	5,497
4	TOTAL PRODUCED AND PURCHASED	5,497
5		
6	WATER SALES	
7	Residential	5,133
8	Commercial	24
9	Industrial	-
10	Bulk Loading Stations	1
11	Wholesale	-
12	Public Authorities	-
13	Other Sales (explain)	-
14	TOTAL WATER SALES	5,158
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	-
18	Wastewater Plant	-
19	System Flushing	-
20	Fire Department	-
21	Other Usage (explain) unknown	0
22	TOTAL OTHER WATER USED	-
23		
24	WATER LOSS	
25	Tank Overflows	-
26	Line Breaks	-
27	Line Leaks	-
28	Excavation Damages	-
29	Theft	-
30	Other Loss (explain) UNKNOWN	339
31	TOTAL WATER LOSS	339
32		
33	Note: Line 14 + Line 22 + Line 31 MUST Equal Line 4	
34		
35	WATER LOSS PERCENTAGE	
36	(Line 31 divided by Line 4)	6.17%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility: BEECH GROVE WATER SYSTEM
 For the Month of: February ~~January~~ Year: 2023

LINE #	ITEM	GALLONS (OR) (OR) (OR)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	4,773
4	TOTAL PRODUCED AND PURCHASED	4,773
5		
6	WATER SALES	
7	Residential	4,512
8	Commercial	253
9	Industrial	
10	Bulk Loading Stations	3
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain)	
14	TOTAL WATER SALES	4,768
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	-
18	Wastewater Plant	-
19	System Flushing	-
20	Fire Department	-
21	Other Usage (explain)	0
22	TOTAL OTHER WATER USED	
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	
27	Line Leaks	
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) <u>UNKNOWN</u>	5
31	TOTAL WATER LOSS	5
32		
33	Note: Line 14 + Line 22 + Line 31 MUST Equal Line 4	
34		
35	WATER LOSS PERCENTAGE	
36	(Line 31 divided by Line 4)	0.10%

Wrong

Wrong

Wrong

Beech Grove
Water System

Consumption ▼

- All Cycle
- Cycle01

Consumption Detail	Consumption Total	Meter Detail	Profile Graph	Graph Options
--------------------	-------------------	--------------	---------------	---------------

Expected Usage: All ▼

<p style="text-align: center;">Search Parameters</p> <p>Account#: _____</p> <p>Name: _____</p> <p>Meter ID: _____</p> <p>Address: _____</p>	<p style="text-align: center;">Consumption Variables:</p> <p>Service Type All ▼</p> <p>Period Type Last Month ▼</p> <p><input checked="" type="checkbox"/> Display Summary</p> <p><input type="checkbox"/> Display Detail</p>	<p style="text-align: center;">Display/Export Rules</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;"></th> <th style="width: 10%;"></th> <th style="width: 10%; text-align: center;">Action</th> <th style="width: 10%; text-align: center;">By</th> </tr> </thead> <tbody> <tr> <td>Rules</td> <td>Display</td> <td style="text-align: center;">Multiply</td> <td style="text-align: center;">10</td> </tr> <tr> <td></td> <td>Export</td> <td style="text-align: center;">Multiply</td> <td style="text-align: center;">10</td> </tr> </tbody> </table> <p style="text-align: center;"><input type="checkbox"/> Apply Rules</p>			Action	By	Rules	Display	Multiply	10		Export	Multiply	10
		Action	By											
Rules	Display	Multiply	10											
	Export	Multiply	10											

Date Range

Start 2/1/2023 ▼

End 2/28/2023 ▼

Closest Reading

Group Code

Select All

AG

NPLO

	Cycle	Route	Total Route	Total Cycle
	01	000001	466177	
	01	000002	249720	
	01	000003	1973017	
	01	000004	977820	
	01	000005	127020	
	01	MASTER	473000	
	01			4266754
Total Consumption of Cycles/Routes:				4266754

Processing time: 92 Seconds

Meter_ID	Read_Time	Read	Read_Unit	Flow_Time	Flow
47681101	1/31/2023 23:59	26125391	GAL	1/31/2023	
47681101	2/1/2023 23:59	26300898	GAL	2/1/2023	175507
47681101	2/2/2023 23:59	26479497	GAL	2/2/2023	178599
47681101	2/3/2023 23:59	26645861	GAL	2/3/2023	166364
47681101	2/4/2023 23:59	26846529	GAL	2/4/2023	200668
47681101	2/5/2023 23:59	27044073	GAL	2/5/2023	197544
47681101	2/6/2023 23:59	27214032	GAL	2/6/2023	169959
47681101	2/7/2023 23:59	27391933	GAL	2/7/2023	177901
47681101	2/8/2023 23:59	27570242	GAL	2/8/2023	178309
47681101	2/9/2023 7:10	27614468	GAL	2/9/2023	40539
47681101	2/9/2023 23:59	27758180	GAL	2/9/2023	147399
47681101	2/10/2023 23:59	27939749	GAL	2/10/2023	181569
47681101	2/11/2023 23:59	28134291	GAL	2/11/2023	194542
47681101	2/12/2023 23:59	28322525	GAL	2/12/2023	188234
47681101	2/13/2023 23:59	28500687	GAL	2/13/2023	178162
47681101	2/14/2023 23:59	28659899	GAL	2/14/2023	159212
47681101	2/15/2023 23:59	28839135	GAL	2/15/2023	179236
47681101	2/16/2023 23:59	29019859	GAL	2/16/2023	180724
47681101	2/17/2023 23:59	29202045	GAL	2/17/2023	182186
47681101	2/18/2023 23:59	29402566	GAL	2/18/2023	200521
47681101	2/19/2023 23:59	29599140	GAL	2/19/2023	196574
47681101	2/20/2023 23:59	29792700	GAL	2/20/2023	193560
47681101	2/21/2023 23:59	29973177	GAL	2/21/2023	180477
47681101	2/22/2023 16:14	30092826	GAL	2/22/2023	119649
47681101	2/22/2023 23:59	30148295	GAL	2/22/2023	55469
47681101	2/23/2023 7:57	30205313	GAL	2/23/2023	57018
47681101	2/23/2023 23:59	30338255	GAL	2/23/2023	132942
47681101	2/24/2023 23:59	30510014	GAL	2/24/2023	172550
47681101	2/25/2023 23:59	30687959	GAL	2/25/2023	177145
47681101	2/26/2023 23:59	30845108	GAL	2/26/2023	157149
47681101	2/27/2023 23:59	30996199	GAL	2/27/2023	151091
47681101	2/28/2023 23:59	31149263	GAL	2/28/2023	153064

Beech Grove Water System
Usage and Charge by Customer Type

<u>Reading Date</u>	<u>Customer Type</u>	<u>Usage</u>	<u>Charge</u>	
February 2023	A —	3,238,240	\$23,145.07	58
February 2023	B	1,200	\$0.00	1
February 2023	C	24,310	\$304.05	12
February 2023	N —	1,240	\$0.00	1
February 2023	R —	1,893,650	\$18,519.97	519
<u>Total for: 2/2023</u>		<u>5,158,640</u>	<u>\$41,969.09</u>	
<u>Grand Total:</u>		<u>5,158,640</u>	<u>\$41,969.09</u>	

Res 5133090