

VERIFICATION

COMMONWEALTH OF KENTUCKY)

) SS:

COUNTY OF FRANKLIN)

The undersigned, KENNETH D. TAYLOR, P.E., being duly sworn, deposes and states he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.

Kenneth D. Taylor PE

KENNETH D. TAYLOR, P.E.

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 31st day of July 2026.

Leah Gearhart (Seal)

Notary Public

My Commission Expires: 11-9-27

Notary ID: Kynp8393



WHITLEY COUNTY WATER DISTRICT #1

RESPONSE TO COMMISSON STAFF'S THIRD REQUEST FOR INFORMATION

CASE NO. 2023-00083

QUESTION NO. 1

Responding Witness: Kenneth D. Taylor, PE

Q-1 Refer to the Read 1st Letter and Invoices filed September 10,2025 (Request fo Reimbursement).:

- a. Provide specific date(s) of service for each item listed on the Kenvirons receipts, instead of a date range.;**
- b. Provide an explanation of the mileage including but not limited to location to and from as well as number of vehicles for each invoice.;**
- c. Provide a brief description of the services provide on the dates provide in response to item 1(a) herein.;**
- d. Explain and describe the use of “PSC assistance – water loss plan” used on both invoices.;** and
- e. Explain the need for lodging for the period for services through May 2025.**

Response:

1.a. See Exhibits A and B attached hereto.

1.b. See Exhibit C attached hereto. Only one vehicle each time.

1.c. See Exhibits A and B attached hereto.

1.d. Kenvirons' project title is “PSC assistance – water loss plan” because we were hired by the Whitley County Water District board to develop the Qualified Infrastructure Plan with an unaccounted water loss reduction plan included in it as ordered by the Commission and assist in its implementation. The District does not have the personnel on staff with the free time to undertake this on their own. A better title might have been “Assistance with Responses in PSC Case No. 2023-00083 and Implementation of Infrastructure Plan”.

1.e See Exhibits A, B and C attached hereto. Local lodging in the area was the most cost effective alternative to additional mileage and travel time required to drive back and forth to Whitley County from our office in Frankfort each time, when we were also in the area for other clients/projects at the time.

RESPONSE TO COMMISSON STAFF'S FIRST REQUEST FOR INFORMATION

CASE NO. 2023-00083

QUESTION NO. 2

Responding Witness: Kenneth D. Taylor, PE

Q-2. Refer to the request for Reimbursement.

- a. Confirm that Whitley District #1 has received the equipment listed in the invoices filed on September 10, 2025. If not confirmed, explain the response.;**
- b. If confirmed, explain if Whitley District #1 has installed or is otherwise utilizing the equipment.; and**
- c. Provide the anticipated percentage of reduction in water loss expected to result from the equipment purchased. If water loss has decreased, provide the months to which this reduction is attributable.**

Response:

2.a. The equipment has been received and is currently stored at the Whitley County Water District #1 office/shop.

2.b. The zone meters have not yet been installed but the portable meter is being used as needed. The District has been waiting to receive permission to transfer the reimbursement funds from the surcharge fund to operating fund to have sufficient funds available to proceed with contracting out the zone meter installations.

2.c. It is anticipated this equipment will reduce the unaccounted-for water loss by 5-10% once fully installed and integrated into the unaccounted-for water loss reduction program.

EXHIBIT A
INVOICE 20240765 BREAKDOWN
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO WHITLEY
COUNTY WATER DISTRICT #1 RESPONSE
CASE NO. 2023-0083

DATE	HOURS	EMPLOYEE POSITION	ACTIVITY
7/28/2023	4.0	Sr. Project Engineer	Work on PSC ordered Qualified Infrastructure Plan
7/31/2023	4.0	Sr. Project Engineer	Work on response to PSC Staff's 1st request for information
11/1/2023	0.5	Sr. Project Engineer	Work on response to PSC Staff's 1st request for information
11/8/2023	4.0	Sr. Project Engineer	Work on response to PSC Staff's 1st request for information
11/9/2023	3.0	Tech IV	Work on response to PSC Staff's 1st request for information
11/9/2023	6.0	Sr. Project Engineer	Work on response to PSC Staff's 1st request for information
11/10/2023	10.0	Sr. Project Engineer	Work on response to PSC Staff's 1st request for information
11/13/2023	2.0	Sr. Project Engineer	Work on response to PSC Staff's 1st request for information
1/18/2024	4.0	Sr. Project Engineer	Work on response to PSC Staff's 2nd request for information
1/10/2024	1.0	Sr. Project Engineer	Work on response to PSC Staff's 2nd request for information
1/30/2024	6.0	Sr. Project Engineer	Work on response to PSC Staff's 2nd request for information
1/31/2024	0.5	Sr. Project Engineer	Work on response to PSC Staff's 2nd request for information
5/1/2024	1.0	Sr. Project Engineer	Prep for mtg with WCWD and KRWA Staff
5/2/2024	4.5	Sr. Project Engineer	Travel to and from WCWD office
5/2/2024	2.5	Sr. Project Engineer	Meeting with WCWD and KRWA Staff
TOTAL	53.0		

EXHIBIT B
INVOICE 20250498 BREAKDOWN
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO WHITLEY
COUNTY WATER DISTRICT #1 RESPONSE
CASE NO. 2023-0083

DATE	HOURS	EMPLOYEE POSITION	ACTIVITY
8/2/2024	5.0	Sr. Project Engineer	Travel to and from WCWD
8/2/2024	1.5	Sr. Project Engineer	Meeting with Badger Meter and WCWD Staff
2/12/2025	2.5	Sr. Project Engineer	Travel to and from WCWD*
2/12/2025	3.0	Sr. Project Engineer	Meeting with WCWD Staff to implement water loss prevention plan
3/27/2025	3.0	Sr. Project Engineer	Travel to and from WCWD *
3/27/2025	3.0	Sr. Project Engineer	WCWD Board Meeting and 2nd meeting with Badger Meter
4/9/2025	3.0	Sr. Project Engineer	Travel to and from WCWD *
4/9/2025	2.5	Sr. Project Engineer	Inspection of sites to install zone meters
4/9/2025	2.0	Sr. Project Engineer	Meeting with WCWD Staff to go over sites and materials for zone meters installation
4/14/2025	0.5	Clerial	Annual Surcharge Report typing
4/14/2025	1.0	Sr. Project Engineer	Annual Surcharge Report
4/16/2025	2.0	Sr. Project Engineer	Meeting with WCWD staff to review Annual surcharge report and plan implementation
4/16/2025	1.0	Sr. Project Engineer	Return from WCWD
4/21/2025	5.0	Sr. Project Engineer	Annual Surcharge Report
4/22/2025	4.0	Sr. Project Engineer	Annual Surcharge Report
4/24/2025	4.0	Sr. Project Engineer	travel to and from WCWD
4/24/2025	3.0	Sr. Project Engineer	WCWD Board Meeting and Surcharge Discussion
TOTAL	46.0		

* Time and expenses split among multiple projects in the area with reduced hours, mileage and expenses off set with lodging.

EXHIBIT C
MILEAGE EXPENSE BREAKDOWN
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO WHITLEY
COUNTY WATER DISTRICT #1 RESPONSE
CASE NO. 2023-0083

DATE	Mileage	ACTIVITY
11/13/2023	34.0	Corbin to WCWD already in area for other meetings/clients*
5/2/2024	210.0	Travel to and from meeting with WCWD Staff and KRWA Staff
8/2/2024	234.0	Travel to and from WCWD for meeting with WCWD Staff and Badger Meter representative
3/27/2026	136.0	Travel to and from WCWD for Board Meeting and second meeting with Badger meter representatives*
4/9/2025	183.0	Travel to and from WCWD for meeting with WCWD staff to discuss proposed zone meter installation sites and materials needed plus inspection of all proposed zone meter sites.*
4/24/2025	241.0	Travel to and from WCWD Board Meeting with discussion of Surcharge status and water loss prevention plan implementation.
* Time and expenses split among multiple projects in the area with reduced hours, mileage and expenses off set with lodging.		