

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ALLEN COUNTY WATER)	CASE NO.
DISTRICT UNACCOUNTED FOR WATER)	2023-00212
LOSS REDUCTION PLAN, SURCHARGE)	
MONITORING)	

ALLEN COUNTY WATER DISTRICT’S VERIFIED MOTION FOR AUTHORITY TO EXPEND WATER SURCHARGE PROCEEDS

Allen County Water District “Allen District” moves for authorization to expend a portion of the proceeds from the Water Loss Surcharge. In support of its motion, Allen District states as follows:

1. In Case No. 2020-00296¹, the Allen District applied to the Kentucky Public Service Commission (“Commission”) for adjustment of its general rates for water service. As part of its ruling in that case, the Commission ordered Allen District to assess a monthly Water Loss Reduction Surcharge of \$1.77 per active meter for 48 months. The Commission’s order in this case further provided that surcharge funds were to be deposited in a designated interest bearing account and no funds could be expended without approval from the Commission and further ordered Allen District to develop a Qualified Infrastructure Improvement Plan including a comprehensive unaccounted-for water loss reduction plan that establishes priorities, a time schedule for eliminating each source of unaccounted-for water loss and a detailed spending plan for the proceeds of the surcharge.

¹ Case No. 2020-00296, *Electronic Application of Allen County Water District for an Alternative Rate Adjustment*, (Ky. PSC. Feb 3, 2021).

2. In April of 2021, Allen District began depositing the funds collected from the water loss surcharge in a designated interest-bearing account.

3. Allen District developed a Qualified Infrastructure Improvement Plan which included a comprehensive unaccounted-for water loss reduction plan that established priorities, a time schedule for eliminating each source of unaccounted-for water loss and a detailed spending plan for the proceeds of the surcharge.

4. On August 3, 2023, the Commission initiated this proceeding for the purpose of monitoring Allen District's unaccounted-for water loss reduction plan surcharge.

5. On August 17, 2023, Allen District filed its Qualified infrastructure Improvement Plan in this proceeding.

6. As part of this proceeding, Allen District has filed monthly water loss reports with the Commission detailing for each month the total amount water loss surcharge billed and collected with accompanying monthly bank statement for the Allen District Water Loss Surcharge Account.

7. Per the Commission's order none of the funds collected from the monthly Water Loss Surcharge have been expended.

8. As of August 30, 2024, the Allen District Surcharge Account had a balance of \$411,667.76.

9. Allen District has undertaken three projects identified and detailed in Table 6 of its Qualified Infrastructure Improvement Plan as 31-E Emergency Repair, Pressure Zone Meters and Water Meter Replacements.

10. As set forth in the Allen District's Response to Commission Staff's First Request for Information the total amount expended as part of the installation of Pressure Zone Meters as \$58,721.92.

11. As set forth in the Allen District's Response to Commission Staff's First Request for Information the total amount expended as part of the 31-E Emergency Repair was \$133,863.00.

12. As set forth in the Allen District's Response to Commission Staff's First Request for Information the total amount expended as part of meter replacement begun in 2019 was \$21,100.

13. Since 2019, Allen District has experienced a reduction in its water loss. Attached as **Composite Exhibit A** are graphs showing monthly water loss rates for 2019, 2020, 2021, 2022, 2023 and 2024 through August.

REQUESTED RELIEF

WHEREFORE, Allen County Water District moves for an Order that authorizes it to expend \$213,684.92 from the designated Water Loss Surcharge Account to cover the costs incurred by the Allen District for the 31-E Emergency Repairs, Pressure Zone Meters and Water Meter Replacements in 2019.

Dated: October 1, 2024

Respectfully submitted



Shawn Rosso Alcott

salcott@kerricklaw.com

KERRICK BACHERT

1411 Scottsville Road

Bowling Green, KY 42101

Telephone: (270)781-8160

Fax: (270) 782-5856

Counsel for Allen County Water District

CERTIFICATE OF SERVICE

I certify that the electronic filing has been transmitted to the Kentucky Public Service Commission on October 1, 2024 and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



Shawn Rosso Alcott

Counsel for Allen County Water District

VERIFICATION

COMMONWEALTH OF KENTUCKY)

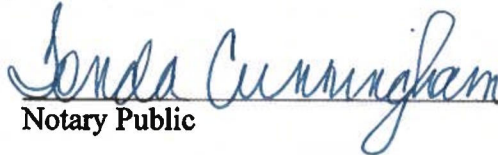
COUNTY OF ALLEN)

The undersigned, Keri Hill, being duly sworn, states that she is the Office Manager of the Allen County Water District and he has personal knowledge of the matters set forth in this Motion and that the statements contained in this Motion true and correct to the best of her information, knowledge and belief.



Keri Hill
Office Manager

Subscribed and sworn to before me, a Notary Public in and before said County and State, this the 1st day of October 2024.

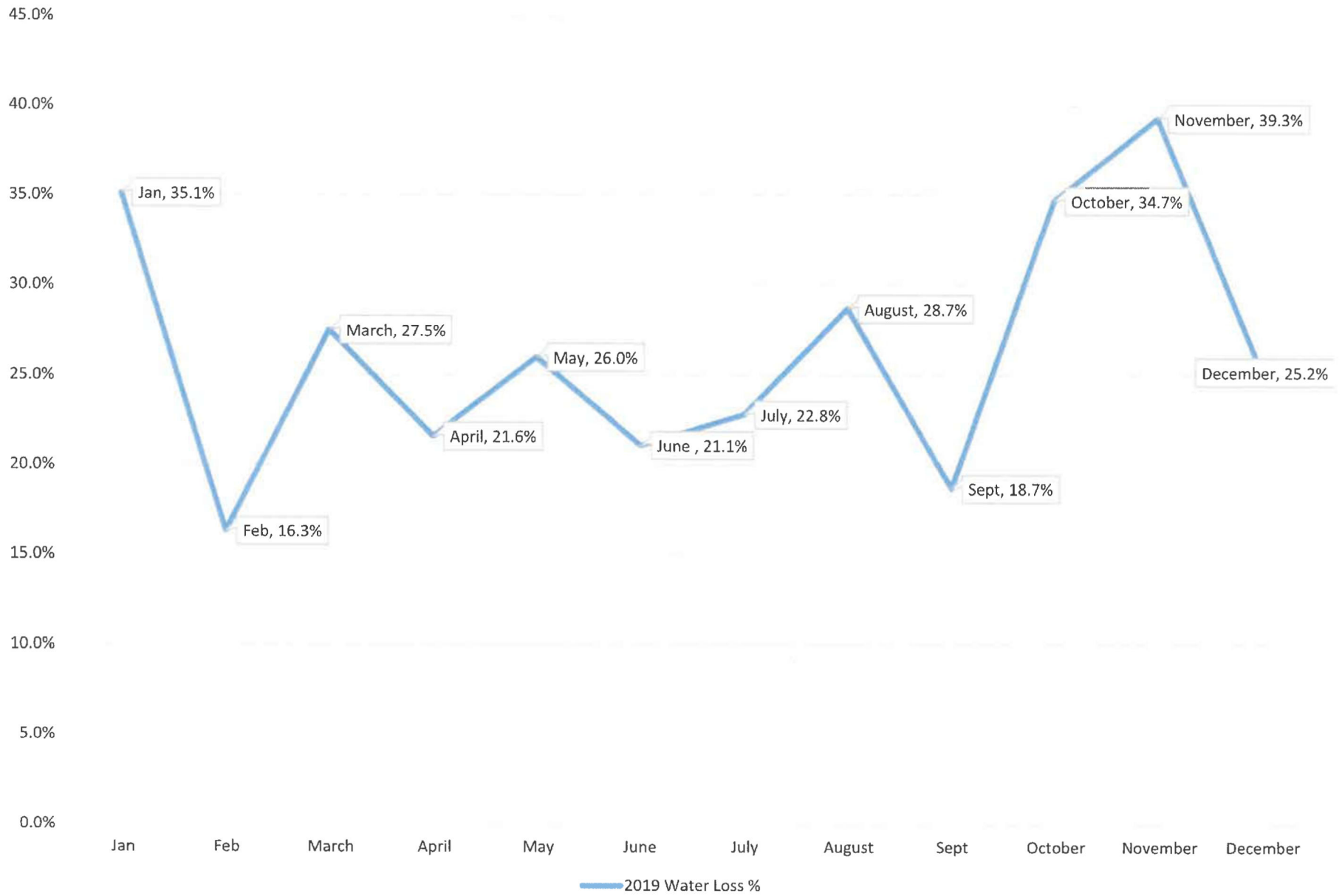


Notary Public

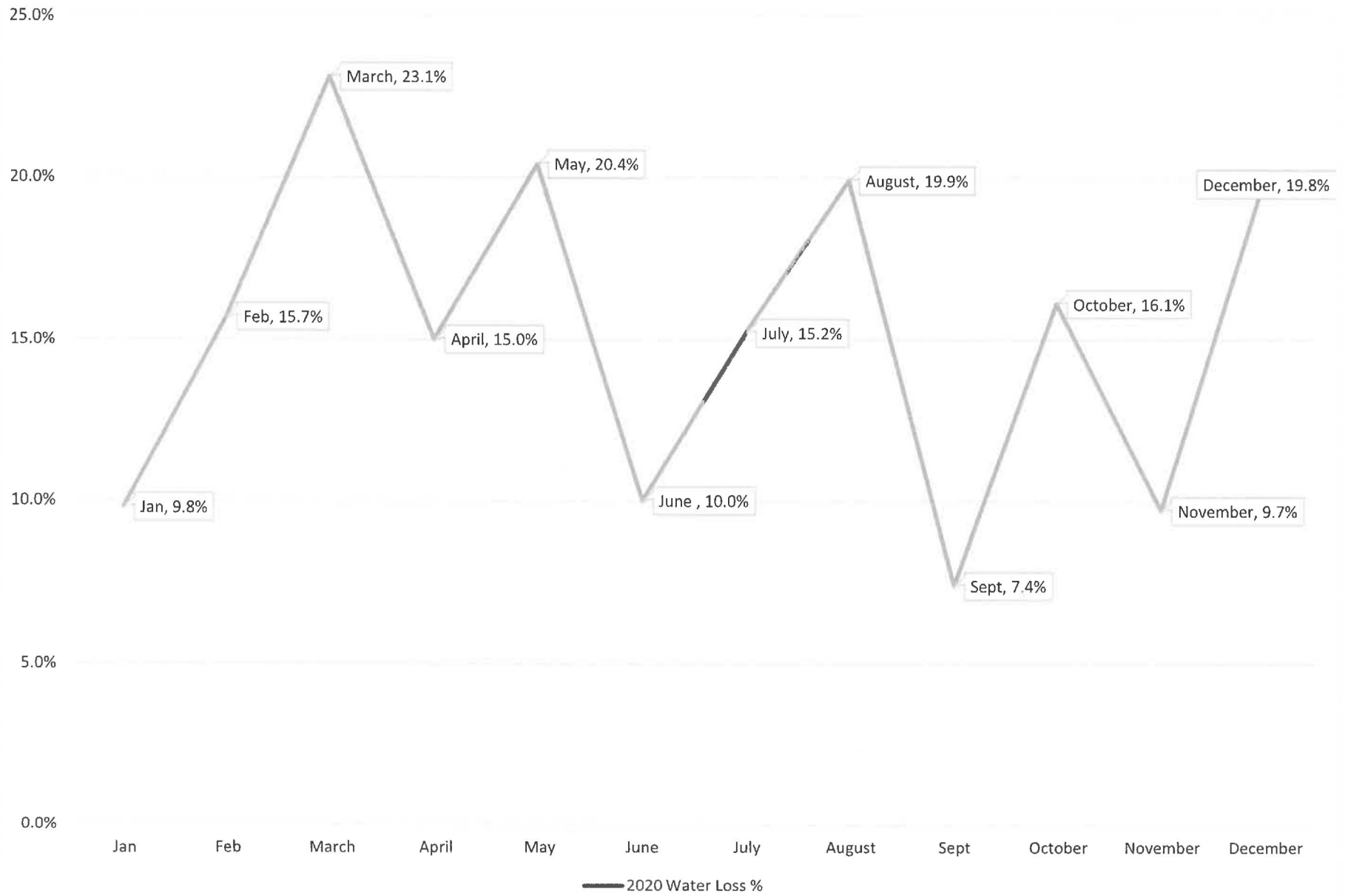
My Commission Expires: 10-10-24
Notary ID: KYNP16191

Composite Exhibit A

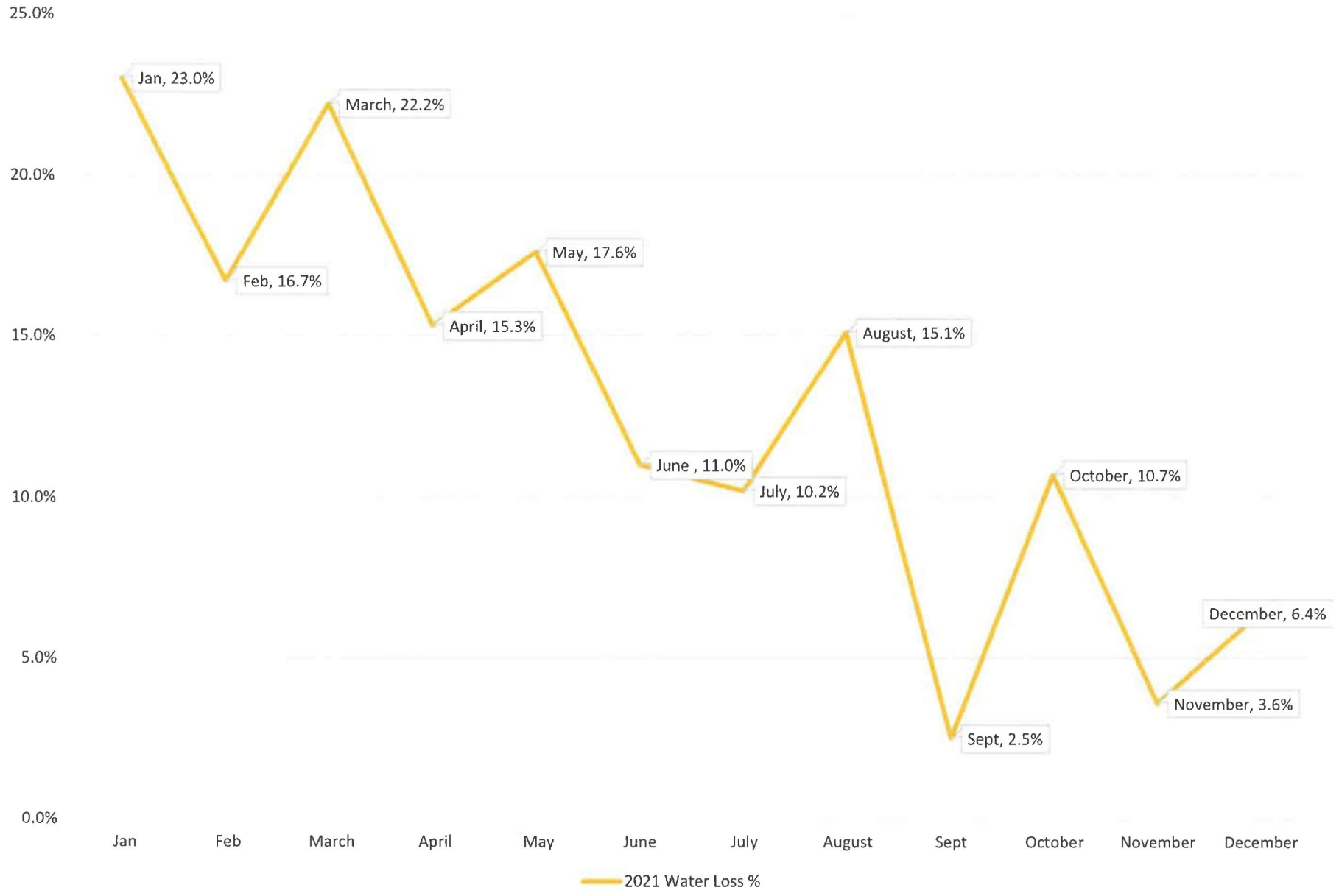
2019 - Water Loss



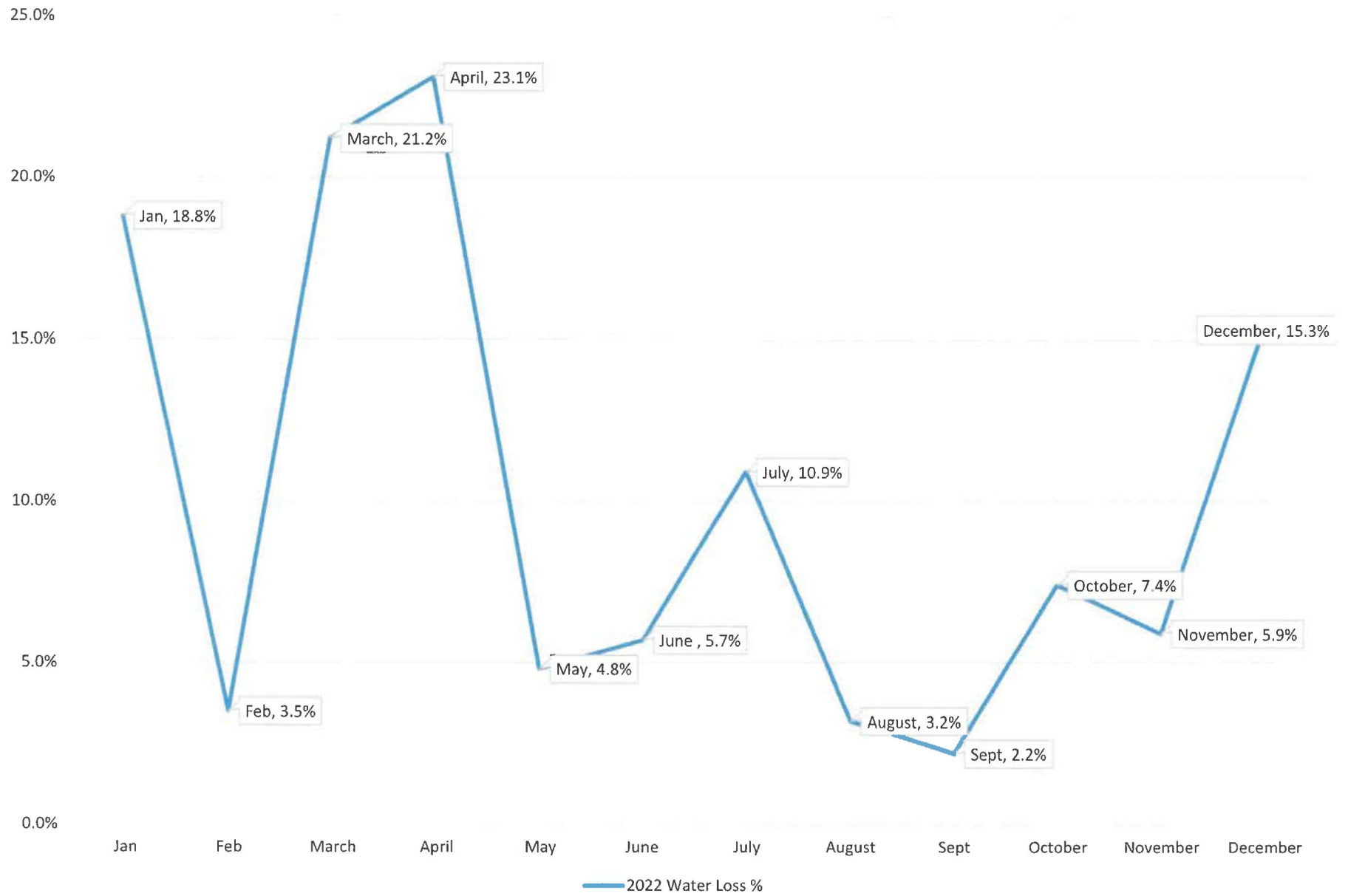
2020 - Water Loss



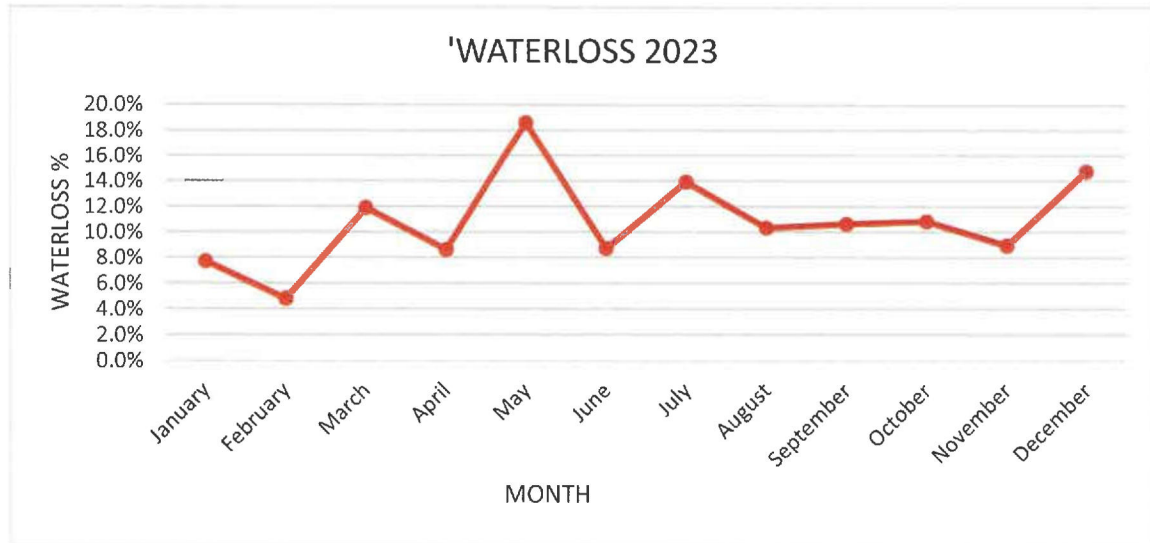
2021 - Water Loss



2022 - Water Loss

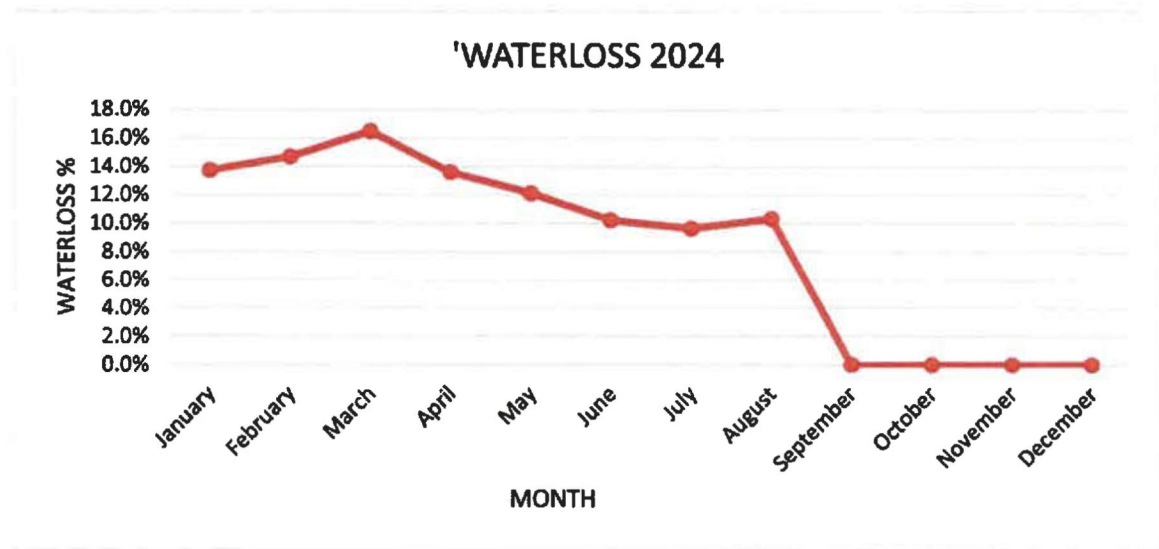


MONTH	WATERLOSS %
January	7.8%
February	4.9%
March	12.0%
April	8.7%
May	18.7%
June	8.8%
July	14.0%
August	10.4%
September	10.7%
October	10.9%
November	9.0%
December	14.8%



TOTAL AVERAGE **10.9%** ANNUAL AVERAGE

MONTH	WATERLOSS %
January	13.7%
February	14.7%
March	16.5%
April	13.6%
May	12.1%
June	10.2%
July	9.6%
August	10.3%
September	0.0%
October	0.0%
November	0.0%
December	0.0%



TOTAL AVERAGE **12.6%** ANNUAL AVERAGE