#### **COMMONWEALTH OF KENTUCKY**

#### **BEFORE THE PUBLIC SERVICE COMMISSION**

#### **IN THE MATTER OF:**

ELECTRONIC HENDERSON COUNTY WATER	)	
DISTRICT UNACCOUNTED FOR WATER LOSS	)	CASE NO.
<b>REDUCTION PLAN, SURCHARGE AND</b>	)	2023-00333
MONITORING	)	

## MOTION FOR AUTHORIZATION TO USE SURCHARGE FUNDS

Comes now Henderson County Water District. ("Henderson District"), by and through counsel, pursuant to 807 KAR 5:001, Section 4, and the Public Service Commission's ("Commission") Order of December 13, 2023, and other applicable law, and respectfully moves the Commission to authorize the expenditure of \$2,800 to pay the attached invoice for leak detection services. In support of this motion, Henderson District respectfully states as follows:

1. By Order on December 13, 2023, the Commission approved an unaccounted-for water loss reduction surcharge for Henderson District and ordered Henderson District to file a Qualified Infrastructure Improvement Plan ("QIIP") with the Commission.

2. Henderson District filed its QIIP in this matter on April 11, 2024, and filed a request for expenditure on June 20, 2024.

3. The Commission's July 22, 2024 Order reviewed Henderson District's requests for expenditure of surcharge funds for 1) the payment of leak detection services performed in May 2024, and 2) payment for the purchase of a portable valve exerciser.

4. The Commission ultimately approved the use of surcharge funds to pay for the two requests made by Henderson District, however ordered that the remaining projects listed in Henderson District's QIIP were continued for further discovery.

5. Henderson District respectfully requests the use of \$2,800 for leak detection services performed by Reveal Underground Services in August 2024. Henderson District is attaching the invoice for the August 2024 work performed by Reveal Underground Services as Exhibit A to this Motion.

6. The request for use of surcharge funds to pay for the leak detection services is in alignment with Henderson District's QIIP filed on June 20, 2024 and meets the standard set forth by the Commission for the use of surcharge funds to allow Henderson District to recover costs of its efforts in water leak detection and repair in order to reduce the increased expense and lost revenue from unaccounted-for water loss.<sup>1</sup> Furthermore, the Commission approved the May 2024 invoice for the leak detection services to be paid from the water loss surcharge funds.<sup>2</sup>

WHEREFORE, on the basis of the foregoing, Henderson District respectfully requests that the Commission authorize the use of surcharge funds for the attached \$2,800 invoice for leak detection services.

Dated this 8<sup>th</sup> day of January, 2025.

<sup>&</sup>lt;sup>1</sup> In the Matter of: Electronic Application of Henderson County Water District for a Rate Adjustment Pursuant to 805 KAR 5:076, Case No. 2023-00101, Order, pp. 18-19, (Ky PSC Dec. 13, 2023).

<sup>&</sup>lt;sup>2</sup> In the Matter of: Electronic Application of Henderson County Water District for a Rate Adjustment Pursuant to 805 KAR 5:076, Case No. 2023-00101, Order, (Ky PSC July. 22,2024).

Respectfully submitted,

& Allyson Honey

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Counsel for Henderson County Water District

#### **CERTIFICATE OF SERVICE**

This is to certify that foregoing was submitted electronically to the Commission on January 8, 2025 and that there are no parties that have been excused from electronic filing. Pursuant to prior Commission orders, no paper copies of this filing will be submitted.

Huyson Honright. Counsel for Henderson County Water District.

# EXHIBIT A

### INVOICE

Reveal Underground Services 88 Liberty Church Rd Hickory, KY 42051-9440

+1 (270) 970-0310 www.revealunderground.com



Bill to Henderson County Water District PO Box 655 Henderson, KY 42419-0655

#### Ship to Henderson County Water District PO Box 655 Henderson, KY 42419-0655

Invoice details

Invoice no.: 1725 Terms: Net 30 Invoice date: 11/13/2024 Due date: 12/13/2024

#	Date	Product or service	Description		Qty	Rate	Amount	
1.	08/20/2024	Leak Detection			1	\$1,400.00	\$1,400.00	
2.	08/26/2024	Leak Detection			1	\$1,400.00	\$1,400.00	
	Ways to	рау		Total		\$2,800.00		
	BANK Provind Venmo			Overdue		12/13/2024		

Contact Reveal Underground Services to pay.

View and pay