

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**ELECTRONIC APPLICATION OF THE SOUTH )  
EASTERN WATER ASSOCIATION, INC. FOR A )  
CERTIFICATE OF PUBLIC CONVENIENCE AND )  
NECESSITY TO CONSTRUCT A SYSTEM ) Case No. 2023 - 00353  
IMPROVEMENTS PROJECT AND AN ORDER )  
AUTHORIZING THE ISSUANCE OF SECURITIES )  
PURSUANT TO KRS 278.023 )**

**RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

The South Eastern Water Association, Inc. ("South Eastern Water"), by Counsel, hereby files its Response to the Commission Staff's First Request for Information, dated November 8, 2023, as follows:

**REQUEST 1:** Provide South Eastern Water's system-flushing records for the past five years.

**WITNESS:** Morris Vaughn, South Eastern Water Association, Inc.

**RESPONSE 1:** the requested system-flushing records are being electronically filed separately in connection with this Response.

**REQUEST 2:** Explain why South Eastern Water has upwards of approximately 35 percent of their purchased water for system flushing for each of the past five years.

**WITNESS:** Morris Vaughn, South Eastern Water Association, Inc.

**RESPONSE 2:** South Eastern Water is a merged water distribution system made up from four former water distribution systems. After the final merger completed in 1996, South Eastern Water has been consistently working with our engineering firm to physically connect the existing systems. With this endeavor, South Eastern Water has experienced several pressure zones to contend with. South Eastern Water consists of eleven storage tanks and eleven booster pump stations. The storage tanks are at various elevations and designed to maintain pressure throughout the distribution system. South Eastern Water buys all the water supplied to it's customers from the City of Somerset. After several large water main extension projects, the system now consists of various sizes of water mains from three inch to twelve inch with a distance of approximately 550 miles, from just north of McCreary County to the boundaries of Laurel County on the east side and north into Lincoln County. South Eastern Water has numerous dead end mains which require flushing.

South Eastern Water is committed to provide its customers with clean and safe potable water that meets and exceeds the Division of Water expectations as well as the Public Service Commission regulations. This commitment requires that the system be flushed and tested as required by the Division of Water to meet the MCL of all regulated Stage II by-products as well as holding a constant CL2 residual in all parts of the system at all times. Also routine flushing is done as well, with flushing for customer concerns in order to maintain strong customer relationships.

The system has a very remote service area with a sparse customer base. Also large areas of lake front with weekend cabins which require flushing often due to large mains leading to the areas with no customers for miles of water mains. Water is furnished to the areas which is pumped and stored in a lead tank then to a secondary tank and then finally to the service tank which is several days in getting to the destination and requires more than usual flushing to meet requirements.

A separate log was maintained for a few years for our records and upon a PSC inspection, the inspector stated the PSC only wanted one log, the following year one log was implemented and is being kept.

South Eastern Water is currently having mixing systems installed in tanks as routine maintenance is being done under the supervision of our consultant Wet & Dry.

**REQUEST 3:** Explain the reasons for South Eastern Water's delay in filing its 2022 Audit Report with the Commission.

**WITNESS:** Morris Vaughn, South Eastern Water Association, Inc.

**RESPONSE 3:** South Eastern Water's Auditor did not complete and present the 2022 Audit Report to South Eastern Water's Board of Commissioners until September 14, 2023. The 2022 Audit Report was not available prior to such date, thus timely submission was not possible.

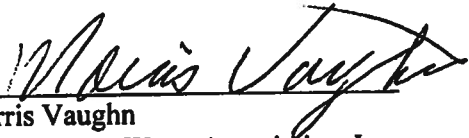
**REQUEST 4:** Provide a date by which South Eastern Water will file its 2022 Audit Report with the Commission.

**WITNESS:** Morris Vaughn, South Eastern Water Association, Inc.

**RESPONSE 4:** An electronic copy of the 2022 Audit Report has been requested from the Auditor and will be provided to the Public Service Commission immediately upon receipt. South Eastern Water expects to electronically submit the 2022 Audit Report on or before November 17, 2023.


**Certification of Responses to Commission Staff's First Request for Information**

I hereby certify that I have supervised the preparation of the Responses to the Commission Staff's First Request for Information. This information provided in the Responses is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
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Morris Vaughn  
South Eastern Water Association, Inc.

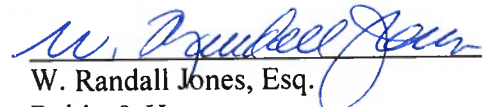
The undersigned has prepared this Response as Counsel to and on behalf of the South Eastern Water Association, Inc., a governmental agency, and hereby certifies that this Response is true and accurate to the best of the undersign's knowledge, information and belief formed after a reasonable inquiry.

Respectfully Submitted:  
Rubin & Hays

By   
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**CERTIFICATE OF SERVICE**

The undersigned, in accordance with 807 KAR 5:001, Section 8, hereby certifies that South Eastern Water Association, Inc.'s electronic filing of the foregoing Response is a true and accurate copy of the same document being electronically transmitted to the Kentucky Public Service Commission on November 14, 2023; and that there are currently no parties that the Kentucky Public Service Commission has excused from participation by electronic means in this proceeding.

  
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