

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC)	
INVESTIGATION INTO)	
FARMDALE WATER DISTRICT)	
TO DETERMINE THE)	
FEASIBILITY OF MERGER)	CASE NO. 2024-00202
WITH A PROXIMATE UTILITY)	
PURSUANT TO KRS 74.361 OR)	
ABANDONMENT PURSUANT TO)	
KRS 278.020(6) AND KRS 278.021)	

JOINT MOTION TO PLACE CASE IN ABEYANCE

Farmdale Water District (“Farmdale District” or the “District”) and the Electric and Water Plant Board of the City of Frankfort, Kentucky (“FPB”), collectively the “Parties,” by and through the undersigned counsel submit their Joint Motion to Place This Case in Abeyance and respectfully request that the Commission rule on this Motion by **April 15, 2025**.

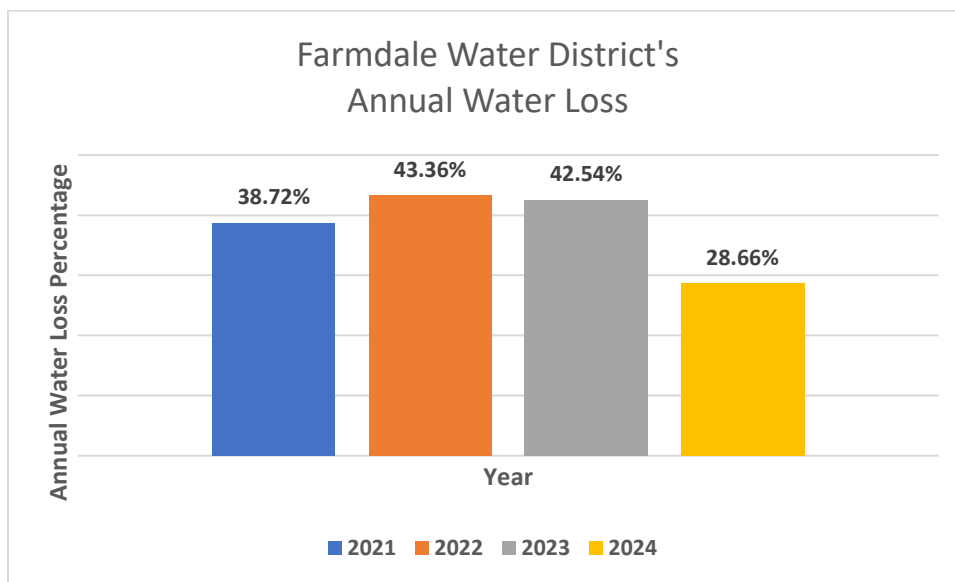
In support of their Motion, the Parties state the following:

1. In its September 4, 2024 Order initiating this proceeding, the Commission noted that many of the violations of Commission Orders, KRS Chapter

74, and administrative regulations previously committed by the District had already been corrected.¹

2. The Commission cited Farmdale District’s 2023 annual water loss of 42.54 percent and Farmdale District’s “inability to develop a water loss plan or manage its finances in a way that would allow its water loss to be promptly mitigated. . .”² as reasons for the Commission to consider merger with another utility to ensure that Farmdale District’s customers are receiving reasonable water rates and service.

3. Farmdale District’s annual water loss for 2024 was 28.66 percent. This is a significant reduction from recent years as depicted in the chart below.



¹ Order at 3, (Ky. PSC Sep. 4, 2024).

² *Id.*

Attached to this Joint Motion as **Attachment 1** are Farmdale District's monthly water loss reports for 2024 as well as the 2024 Annual Water Loss Report.

4. Farmdale District filed an updated Qualified Infrastructure Improvement Plan and a seven-year capital spending plan into the record of this proceeding and into the record of its Surcharge Monitoring proceeding, Case No. 2020-00217, on December 27, 2024.

5. On January 24, 2025, Farmdale District received Commission approval to use \$266,451.42 of its Surcharge Funds to purchase 1,000 new customer meters and transceivers, and to cover the cost of materials needed to complete the Benson Creek Project. Both the Benson Creek Project and customer meter replacement are important components of Farmdale District's plan to reduce water loss.

6. Farmdale District has received delivery of its new meters and has begun meter replacement. The District anticipates its water loss will decrease as the meters are replaced.

7. Farmdale District has engaged the services of Kentucky Rural Water Association to prepare an Alternative Rate Filing by the Commission imposed deadline of August 31, 2025.

8. Farmdale District has taken the Commission's grave concern regarding the District's ability to provide reasonable and adequate water service very seriously. To this end, it has actively explored its options regarding merger or acquisition by

another utility and other operational arrangements. Farmdale District has met with representatives of Kentucky American Water and has availed itself of training in the benefits of joint operation agreements.

9. Realizing that Farmdale District often has need of technical assistance but believing that merger was not the answer to the problem, the Board of Commissioners at Farmdale District approached FPB to assess its willingness and ability to provide such assistance.

10. Farmdale District and FPB have agreed to a five-year arrangement wherein the two water systems will utilize economies of scale to operate in a more cost-effective manner, and FPB will provide Farmdale District with assistance in meter installation, meter reading, meter testing, developing capital improvement plans and project profiles, as well as loan and grant applications. The two systems executed an Assistance Agreement setting forth these provisions in December 2024. A copy of the Assistance Agreement and a copy of the Mutual Aid Agreement that sets forth the Parties intention of aiding one another in emergencies were filed into the record of this proceeding on December 17, 2024.

11. The Parties have each filed verified written testimony explaining how the Assistance and Mutual Aid Agreements will benefit Farmdale District and articulating their commitment to the success of the arrangement.

12. The Assistance Agreement arrangement between the Parties has the support of Franklin County Fiscal Court 1st District Magistrate, Ms. Sherry Sebastian. Farmdale District lies within Magistrate Sebastian's district. Magistrate Sebastian is also a Farmdale District customer. In her February 6, 2025 public comment, Magistrate Sebastian noted the cooperative relationship between the Parties and stated that the relationship was based on professionalism and trust. She stated that a decision by the Commission to force a merger between Farmdale District and another water district while the Assistance Agreement is in place and working well may be inadvisable and not beneficial to the customers of the District.

13. As articulated in the verified written direct testimony of Sharmista Dutta, P.E., Scottie Wooldridge, Jonathan Dailey, and Eddie Harrod filed into the record of this proceeding, Farmdale District and FPB are operating under the terms of the Assistance Agreement. Ms. Dutta is attending Farmdale District's Board meetings and has assisted Farmdale in developing a seven-year capital spending plan. FPB provided Farmdale District with the transceivers to be used with its meters at less cost than Farmdale District would have otherwise been able to purchase the transceivers. The Parties maintain that the Assistance Agreement is working well.

14. The Parties respectfully request that the Commission place this case in abeyance for a period of at least one year and re-evaluate the need to further

investigate the possibility of merging Farmdale District with a proximate utility at the end of the period of abeyance, should the Commission deem it necessary at that time.

15. The Parties understand that the Commission may desire routine progress reports and are willing to comply with such a request.

WHEREFORE, on the basis of the forgoing, The Parties jointly and respectfully move the Commission to place this case in abeyance for a period of at least one year and that the Commission rule on this Motion by **April 15, 2025**.

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, and the Public Service Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was transmitted to the Public Service Commission on February 26, 2025 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding

A handwritten signature in blue ink, reading "Damon P. Talley", is positioned above a horizontal line.

Counsel for Farmdale Water District

Attachment 1

2024 Water Loss Reports

PUBLIC SERVICE COMMISSION

2024 Water Loss Report

Water Utility: Farmdale Water District

For the Month of: Annual Year: 2024

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	-
3	Water Purchased	223,452,515
4	TOTAL PRODUCED AND PURCHASED	223,452,515
5		
6	WATER SALES	
7	Residential	120,386,470
8	Commercial	30,272,030
9	Industrial	-
10	Bulk Loading Stations	-
11	Wholesale	-
12	Public Authorities	-
13	Other Sales (explain) _____	-
14	TOTAL WATER SALES	150,658,500
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	-
18	Wastewater Plant	-
19	System Flushing	5,908,250
20	Fire Department	62,550
21	Other Usage (explain) _____	2,785,300
22	TOTAL OTHER WATER USED	8,756,100
23		
24	WATER LOSS	
25	Tank Overflows	-
26	Line Breaks	12,114,140
27	Line Leaks	1,420,600
28	Excavation Damages	-
29	Theft	-
30	Other Loss	50,503,175
31	TOTAL WATER LOSS	64,037,915
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)	28.66%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

Farmdale Water District

For the Month of:

January

Year:

2024

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	20,671,720
4	TOTAL PRODUCED AND PURCHASED	20,671,720
5		
6	WATER SALES	
7	Residential	9,725,200
8	Commercial	2,845,100
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain)	
14	TOTAL WATER SALES	12,570,300
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	62,000
20	Fire Department	6,850
21	Other Usage (explain)	
22	TOTAL OTHER WATER USED	68,850
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	1,850,000
27	Line Leaks	55,000
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) Unknown	6,127,570
31	TOTAL WATER LOSS	8,032,570
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)	38.86%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility: Farmdale Water District

For the Month of: February Year: 2024

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	19,161,070
4	TOTAL PRODUCED AND PURCHASED	19,161,070
5		
6	WATER SALES	
7	Residential	8,533,500
8	Commercial	2,346,900
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	10,880,400
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	23,000
20	Fire Department	1,500
21	Other Usage (explain) _____	
22	TOTAL OTHER WATER USED	24,500
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	1,320,500
27	Line Leaks	10,000
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) <u>Unknown</u>	6,925,670
31	TOTAL WATER LOSS	8,256,170
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)	43.09%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

For the Month of: Year:

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	18,369,610
4	TOTAL PRODUCED AND PURCHASED	18,369,610
5		
6	WATER SALES	
7	Residential	7,842,600
8	Commercial	2,014,600
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	9,857,200
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	58,500
20	Fire Department	1,600
21	Other Usage (explain) _____	
22	TOTAL OTHER WATER USED	60,100
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	990,500
27	Line Leaks	40,200
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) <u>Unknown</u>	7,421,610
31	TOTAL WATER LOSS	8,452,310
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)	46.01%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

For the Month of: Year:

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	17,944,360
4	TOTAL PRODUCED AND PURCHASED	17,944,360
5		
6	WATER SALES	
7	Residential	9,513,200
8	Commercial	2,319,300
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	11,832,500
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	78,500
20	Fire Department	1,250
21	Other Usage (explain) _____	
22	TOTAL OTHER WATER USED	79,750
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	58,500
27	Line Leaks	
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) <u>Unknown</u>	5,973,610
31	TOTAL WATER LOSS	6,032,110
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)	33.62%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

For the Month of: Year:

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	20,904,855
4	TOTAL PRODUCED AND PURCHASED	20,904,855
5		
6	WATER SALES	
7	Residential	11,729,100
8	Commercial	4,170,200
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	15,899,300
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	202,000
20	Fire Department	8,000
21	Other Usage (explain) _____	
22	TOTAL OTHER WATER USED	210,000
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	
27	Line Leaks	48,000
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) <u>Unknown</u>	4,747,555
31	TOTAL WATER LOSS	4,795,555
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)	22.94%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

For the Month of: Year:

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	21,448,700
4	TOTAL PRODUCED AND PURCHASED	21,448,700
5		
6	WATER SALES	
7	Residential	11,564,500
8	Commercial	2,630,100
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	14,194,600
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	128,000
20	Fire Department	2,000
21	Other Usage (explain) DBP Flushing _____	58,000
22	TOTAL OTHER WATER USED	188,000
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	138,000
27	Line Leaks	
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) Unknown _____	6,928,100
31	TOTAL WATER LOSS	7,066,100
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)	32.94%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

For the Month of: Year:

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	18,162,700
4	TOTAL PRODUCED AND PURCHASED	18,162,700
5		
6	WATER SALES	
7	Residential	11,383,400
8	Commercial	2,864,300
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	14,247,700
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	58,500
20	Fire Department	21,150
21	Other Usage (explain) DBP Flushing _____	265,000
22	TOTAL OTHER WATER USED	344,650
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	
27	Line Leaks	645,000
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) Unknown _____	2,925,350
31	TOTAL WATER LOSS	3,570,350
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)	19.66%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility: Farmdale Water District

For the Month of: August Year: 2024

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	16,862,500
4	TOTAL PRODUCED AND PURCHASED	16,862,500
5		
6	WATER SALES	
7	Residential	12,067,600
8	Commercial	3,178,600
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	15,246,200
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	58,500
20	Fire Department	9,350
21	Other Usage (explain) _____ DBP Flushing	35,000
22	TOTAL OTHER WATER USED	102,850
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	330,000
27	Line Leaks	9,500
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) _____ Other "Unknown" Loss	1,173,950
31	TOTAL WATER LOSS	1,513,450
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)	8.98%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

For the Month of: Year:

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	17,222,100
4	TOTAL PRODUCED AND PURCHASED	17,222,100
5		
6	WATER SALES	
7	Residential	9,882,800
8	Commercial	2,433,300
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	12,316,100
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	98,300
20	Fire Department	9,600
21	Other Usage (explain) <u>DBP Flushing</u>	2,250,300
22	TOTAL OTHER WATER USED	2,358,200
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	
27	Line Leaks	2,130,590
28	Excavation Damages	350,000
29	Theft	
30	Other Loss (explain) <u>Unknown</u>	67,210
31	TOTAL WATER LOSS	2,547,800
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)	14.79%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility: Farmdale Water District

For the Month of: October Year: 2024

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	17,633,300
4	TOTAL PRODUCED AND PURCHASED	17,633,300
5		
6	WATER SALES	
7	Residential	11,006,200
8	Commercial	1,966,700
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	12,972,900
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	1,950,250
20	Fire Department	
21	Other Usage (explain) DBP Flushing _____	67,000
22	TOTAL OTHER WATER USED	2,017,250
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	1,956,450
27	Line Leaks	25,500
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) Unknown _____	661,200
31	TOTAL WATER LOSS	2,643,150
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)	14.99%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility: Farmdale Water District

For the Month of: November Year: 2024

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	16,279,300
4	TOTAL PRODUCED AND PURCHASED	16,279,300
5		
6	WATER SALES	
7	Residential	8,033,470
8	Commercial	1,983,330
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	10,016,800
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	1,540,300
20	Fire Department	250
21	Other Usage (explain) <u>DBP Flushing</u>	65000
22	TOTAL OTHER WATER USED	1,605,550
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	1,489,600
27	Line Leaks	87,000
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) <u>Unknown Loss</u>	3,080,350
31	TOTAL WATER LOSS	4,656,950
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)	28.61%

PUBLIC SERVICE COMMISSION

Monthly Water Loss Report

Water Utility:

Farmdale Water District

For the Month of:

December

Year:

2024

LINE #	ITEM	GALLONS (Omit 000's)
1	WATER PRODUCED AND PURCHASED	
2	Water Produced	
3	Water Purchased	18,792,300
4	TOTAL PRODUCED AND PURCHASED	18,792,300
5		
6	WATER SALES	
7	Residential	9,104,900
8	Commercial	1,519,600
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	TOTAL WATER SALES	10,624,500
15		
16	OTHER WATER USED	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	1,650,400
20	Fire Department	1,000
21	Other Usage (explain) DBP Flushing	45,000
22	TOTAL OTHER WATER USED	1,696,400
23		
24	WATER LOSS	
25	Tank Overflows	
26	Line Breaks	1,850,000
27	Line Leaks	150,400
28	Excavation Damages	
29	Theft	
30	Other Loss (explain) Unknown	4,471,000
31	TOTAL WATER LOSS	6,471,400
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)	34.44%