

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
GREEN RIVER VALLEY WATER	)	
DISTRICT FOR A CERTIFICATE OF	)	
PUBLIC CONVENIENCE AND	)	CASE NO.
NECESSITY TO INSTALL THE AMI	)	2026-00092
PROJECT PURSUANT TO THE	)	
PROVISIONS OF KRS 278.020 AND	)	
KAR 5:001.	)	

RESPONSE OF
GREEN RIVER VALLEY WATER DISTRICT
TO
COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
DATED JULY 23, 2026

Filed July 24, 2026

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**RESPONSE OF GREEN RIVER VALLEY WATER DISTRICT TO
COMMISSION STAFF’S SECOND REQUEST FOR INFORMATION**

Green River Valley Water District (“Green River Valley” or the “District”) submits its Response to Commission Staff’s Second Request for Information.

/s/Tina C. Frederick
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Lexington, Kentucky 40507
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*Counsel for Green River Valley
Water District*

CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on July 24, 2026; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

/s/Tina C. Frederick
Tina C. Frederick

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF HART)


John Bunnell, Chairman
Green River Valley Water District

Stephanie Reynolds
Notary Public

Notary ID: KYNP42569

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF HART)

The undersigned, Andrew Tucker, being duly sworn, deposes and states: that he is the Manager of Green River Valley Water District in Horse Cave, Kentucky; that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness in Green River Valley Water District's Response to Staff's Second Request for Information in Kentucky Public Service Commission Case No. 2026-00092; and the information contained therein is true and correct to the best of his information, knowledge, and belief.

et.



Andrew Tucker, Manager
Green River Valley Water District

Subscribed, sworn to, and acknowledged before me, a Notary Public in and
for said County and State, this 24 day of July 2026.

Wesley Rota
Notary Public

My Commission Expires: 06-20-2028

Notary ID: KYNP 89791

GREEN RIVER VALLEY WATER DISTRICT

Case No. 2026-00092

Response to Commission Staff's Second Request for Information

Question No. 2-1

Responding Witness: Andrew Tucker, General Manager

Q 2-1. Refer to Green River Valley District's response to Commission Staff's First Request for Information (Staff's First Request), Item 15, Attachment 1-15. Refer also to Green River Valley District's response to Staff's First Request, Item 1. Explain the reasoning for proposing to purchase 9,200 meters when Green River Valley District's System has approximately 7,500 meters.

A 2-1. At the close of 2025, Green River Valley District had 7,776 active meters. As of June 1, 2026, the number of active meters in the District's system had risen to 7,949. When the District obtained a quote to convert its entire system to AMI, it requested pricing information for 9,200 meters in order to obtain pricing for enough meters to allow for growth in the system and to convert the Hart County System to AMI as well. The District was attempting to be proactive in locking in the price for enough meters to cover its potential needs for a full 24-month period. As the District stated in its Application in paragraph 18, Core & Main has agreed to honor the \$282 per meter price for 24 months.

As Green River Valley District has stated previously, it does **not** intend to replace the meters in the Hart County System immediately, as

those meters are not yet approaching 10 years of age. However, Green River Valley District is requesting Commission approval to deploy AMI technology throughout its **entire** system. Should the Commission approve the transfer of assets proposed in Case No. 2025-00329, this includes the Hart County System.

Generally, meter replacement is a routine operational function of a water utility, and Commission approval for meter replacement is only sought when converting to a newer technology, such as AMI, or when long-term financing for a wide-spread meter replacement project is necessary. For several years, Green River Valley District has replaced approximately 700 meters each year in an effort to replace its meters gradually and to maintain a 5/8 x 3/4-inch meter-fleet that is less than 10 years of age. Because of purchases made 9-11 years ago, the District has a greater than normal number of meters turning 10 years of age within the next year. This makes now an opportune time to convert to AMI.

To clarify, Green River Valley District is not seeking Commission approval to purchase and install **a particular number** of meters. The District is seeking Commission approval to convert its **entire system** to AMI, and to begin this conversion with an initial

purchase and installation of 5,000 meters. Should the Commission grant this Application to deploy AMI technology and also approve the transfer of the Hart County System to Green River Valley District. Green River Valley District will replace the meters in the Hart County System with AMI meters when they are 10 years of age, or when they fail to function, whichever occurs first.

GREEN RIVER VALLEY WATER DISTRICT

Case No. 2026-00092

Response to Commission Staff's Second Request for Information

Question No. 2-2

Responding Witnesses: Andrew Tucker, General Manager
John Bunnell, Chairman

Q 2-2. Refer to Green River Valley District's response to Staff's First Request Item 28. Provide an estimated timeline for the following:

- a. When Green River Valley District expects the replacement of the first 5,000 meters would be completed.**
- b. When Green River Valley District would seek additional financing for the remaining meters in need of replacement.**
- c. When Green River Valley District expects full advanced metering infrastructure (AMI) deployment would be completed.**

A 2-2a. Green River Valley District estimates that the first 5,000 AMI meters will be installed within 8 months of Commission approval of the project, barring an exceptionally harsh winter. Green River Valley District anticipates it will complete installation of the first 5,000 meters by the end of the first quarter of 2027 or the beginning of the second quarter of 2027.

A 2-2b. Green River Valley District will seek funding for the second phase of its system-wide AMI deployment when phase one is nearing completion. The District estimates this will occur approximately six to

seven months after receiving Commission approval for the AMI Project. The second phase will follow the initial installation of 5,000 meters, which the District considers to be phase one of the AMI Project.

A 2-2c. Green River Valley District anticipates that full deployment of AMI can be accomplished within one year of Commission approval. Again, this is barring an exceptionally harsh winter. This also does not include the Hart County System. The District will replace the Hart County System meters when they reach 10 years of age or cease to function properly, whichever occurs first. Green River Valley District anticipates that replacing the meters in the Hart County System will take approximately three to four months and should be undertaken in warm weather, as opposed to winter. The area is very rural and because of the locations of some meters, replacement may require extensive digging.

GREEN RIVER VALLEY WATER DISTRICT

Case No. 2026-00092

Response to Commission Staff's Second Request for Information

Question No. 2-3

Responding Witnesses: John Bunnell, Chairman

Q 2-3. Refer to the Application, page 14, Item 31.

- a. Provide any documentation for short-term financing provided by the local financing institution.**
- b. Provide the interest rate for the short-term financing. If the interest rate for the short-term financing has not been finalized, provide the expected interest rate.**

A 2-3a. Attached to this response as **Attachment 2-3a** is a letter from the Cecilian Bank confirming a \$1,400,000 loan commitment. As Green River Valley District has provided in previous responses it will pay the balance of the costs of installing the first 5,000 meters with unrestricted cash reserves or funds remaining from a Cleaner Water grant or a combination of the two.

A 2-3b. The interest rate has not yet been finalized, but it is reasonably anticipated to be approximately 4.75%.

Attachment 2-3a

Loan Commitment Letter



Oaklawn Banking Center
1808 North Dixie Avenue
Elizabethtown, KY 42701
P: (270) 737-1593
F: (270) 737-6391
www.TheCecilianBank.com

July 24, 2026

Board of Directors
Green River Valley Water District
1180 E. Main Street
Horse Cave, KY 42749

Dear Board:

This letter is to verify that The Cecilian Bank is committed to a loan for \$1,400,000.00 to Green River Valley Water District for the purchase of 5,000 Kamstrup flow IQ 2200 model 5/8 x 3/4 electronic water meters, 3 Kamstrup AMI data collectors (receivers), and software for leak detection for district.

If you have any questions, please feel free to contact me at 270-737-1593.

Thank you for your continued business.

Sincerely,

Tracie Oliver

Tracie Oliver
SVP/Chief Lending Officer

Proudly Serving the Local Community Since 1903!
Your Bank of Choice in Hardin, Grayson, Breckinridge, and Meade Counties

GREEN RIVER VALLEY WATER DISTRICT

Case No. 2026-00092

Response to Commission Staff's Second Request for Information

Question No. 2-4

Responding Witness: Andrew Tucker, General Manager

Q 2-4. Refer to the Application, pages 1-2, and page 18, Item 40.

- a. Confirm that “Leak Detector” software is either an optional separate piece of software or an optional add-on to the “AMI Standard” software packages. If not confirmed, explain**
- b. Identify the period for which Green River Valley District intends to use Leak Detector software.**
- c. Explain if Green River Valley District intends to discontinue the use of Leak Detector software prior to the expiration of the useful life of the meters or receivers, and if so, explain when and under what circumstances discontinuation would occur.**

A 2-4a. Confirmed. The Leak Detector software is an optional add-on to the AMI Standard software. Green River Valley District could discontinue its subscription to Leak Detector and continue its subscription to AMI Standard.

A 2-4b. Green River Valley District anticipates using Leak Detector software indefinitely. This software package benefits customers by helping the District identify leaks on the customer side of the meter as well as leaks in the District's system. The software has the potential to

save the District's customers a great deal of money by giving the District early notification of the existence of a leak. This is because the District notifies the customer immediately when it receives an alert concerning a leak on the customer's side of the meter. The customer can then address the leak by repairing his or her service line or fixture before amassing a huge and unexpected water bill.

During the Pilot Project the District experienced the advantages provided by this software. It notified the District of the existence of a leak long before the District would have otherwise become aware of it. The software also provided the location of the leak, which could have taken the District weeks to find without this technology. Given the benefits to the District and its customers, the District intends to use the Leak Detector software for the life of the meters.

A 2-4c. No, as provided in the response to 4b above, Green River Valley District plans to utilize the Leak Detector software for the life of the meters.

GREEN RIVER VALLEY WATER DISTRICT**Case No. 2026-00092****Response to Commission Staff's Second Request for Information****Question No. 2-5****Responding Witness:** Andrew Tucker, General Manager

Q 2-5. Refer to Green River Valley District's response to Staff's First Request, Item 16. Provide the total estimated cost to replace existing 1-inch and 2-inch meters with the proposed AMI meter, broken down by meter size.

A 2-5. Green River Valley District will respond to this question by referring to its Response to Staff's First Request, Item 17, which set forth the number of 1-inch and 2-inch meters currently in Green River Valley District's system.

Cost to Replace Larger Meters with AMI

1-inch Meters	\$19,995
<u>2-inch Meters</u>	<u>\$33,790</u>
Total	\$53,785

There are currently 43 1-inch meters in the District's system. The cost of a 1-inch Kamstrup AMI meter is \$465. $\$465 \times 43 \text{ meters} = \$19,995$ replacement cost. There are 31 2-inch meters currently in the District's system. The cost of a 2-inch Kamstrup AMI meter is \$1,090. $\$1,090 \times 31 \text{ meters} = \$33,790$ replacement cost.

GREEN RIVER VALLEY WATER DISTRICT

Case No. 2026-00092

Response to Commission Staff's Second Request for Information

Question No. 2-6

Responding Witness: Andrew Tucker, General Manager

Q 2-6. Referring to Green River Valley District's response to Staff's First Request, Item 15, Attachment 1-15. Confirm that the Core & Main quote does not include Edmonson District's Hart County System. If not Confirmed, explain.

A 2-6. Not confirmed. Green River Valley District requested a quote that would include the number of meters the District estimated it would need to replace its current meters in service, allow for modest growth in the system, and replace the meters in the Hart County System. As explained in the response to Item 1, above, the District it did this to lock in the price for a sufficient number of meters to meet any need it might experience in the 24-month period for which Kamstrup agreed to honor its bid price. Should the Commission approve the request made in this proceeding and approve the transfer of assets proposed in Case No. 2026-00329, the District will replace the meters in the Hart County System when they reach 10 years of age or cease functioning, whichever occurs first. The number of meters included in the price quote represents the maximum number of meters the District

anticipated needing in a 24-month period given a worst-case scenario wherein the Hart County Meters required early replacement. The District believed it to be prudent to obtain pricing security for the maximum number of meters it could need rather than the minimum number required.