

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

September 3, 2009

Mr. Jeff Derouen
Executive Director - Kentucky Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40620-0615

**SUBJECT: Response to Data Request from MHC Counsel, Dated 18-August, 2009
Case 2009-00113 - Tariff for Master Metering of Mobile Home Communities**

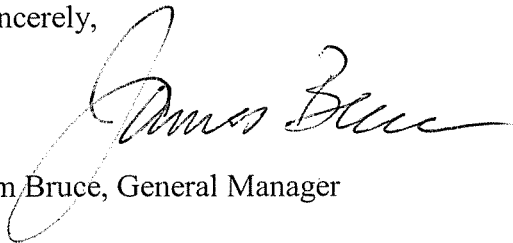
Dear Director Derouen,

Enclosed please find an original and 7 copies of our response to a data request filed by the counsel for Mobile Home Communities regarding the above referenced tariff case (2009-00113). We have also filed a copy with Mr. Robert C. Moore, attorney at law representing the parties of record.

This response is being filed in accordance with the procedural schedule issued in order by the Commission, dated 27-July, 2009.

If you have any questions, please do not hesitate to call me or our attorney, Mr. David Wilson II (Phone: 270-351-4404).

Sincerely,



Jim Bruce, General Manager

Cf; Mr. David Wilson II, HCWD1 Attorney

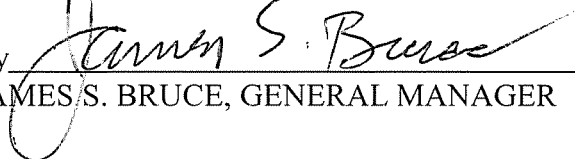
Encl.

RECEIVED
SEP 08 2009
PUBLIC SERVICE
COMMISSION

VERIFICATION


The undersigned, Mr. James S. Bruce, General Manager of the Hardin County Water District No.1, hereby verifies that he has personal knowledge of the matters set forth in the enclosed response to a Data Request from the MHC's Counsel, dated 18-August, 2009, in the matter of a proposed tariff allowing the use of master meters in mobile home communities and that he is duly designated by the Board of Commissioners of the Hardin County Water District No. 1 to sign and submit this information its behalf.

HARDIN COUNTY WATER DISTRICT No. 1

By 
JAMES S. BRUCE, GENERAL MANAGER

CERTIFICATION OF SERVICE

The undersigned, Mr. Michael A. Pike, partner for the attorney of the Hardin County Water District No. 1, hereby verifies that the foregoing was served on Mr. Jeff Derouen, Executive Director, Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, KY. 40601-8204 and on the Mr. Robert C. Moore, Attorney for parties of record, Hazelrigg & Cox, LLP, 415 West Main Street, Frankfort, KY. 40602 on this _____ Day of September, 2009

By 
Mr. Michael A. Pike, ESQ. for Mr. David T. Wilson II, ESQ.
Attorney for Hardin County Water District No. 1

STATE OF KENTUCKY
COUNTY OF HARDIN

I, the undersigned, a Notary Public, do hereby certify that on this 3rd day of September, 2009, personally appeared before me, James S. Bruce and Michael A. Pike, who being by me first sworn, subscribed to and acknowledged that they both represent the Hardin County Water District No. 1, a Kentucky Corporation, that they have signed the foregoing document as General Manager and Attorney of the Corporation.


NOTARY PUBLIC, STATE OF KENTUCKY

My Commission Expires;

11-29-11

1. Hardin County's answer to the PSC's First Data Response No. 1 contained a spreadsheet reflecting that the individual lots in the Brentwood Estates Mobile Home Park ("MHP") and the Country Lane MHP used more water than was actually measured by the master meter in the month of 2008. Please explain how this could have occurred.

ANSWER: Assume question refers to reading for *March, 2008*, not the "*month of 2008*".

As with any mechanical meter, a meter may become slow or stuck. When this has happened on our MHC loss spreadsheet, we have not included that MHC in total calculation, and have also issued a work order to have the master meter checked and repaired if needed. It can also be a misread by meter readers.

Over the 16 months of readings for that location, only March, 2008 shows slow master meter reading, which was corrected in following month. No master meter readings are used for any billing purposes, only for calculating individual MHC and total MHC water loss, and errant readings have not been used in those calculations.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

2. Hardin County's answer to the PSC's First Data Response No.1 reflected that 97% of the water provided to Park Valley Community MHP through its master meter was not billed to an individual lot. Please describe the steps taken by Hardin County to notify Park Valley Community MHP of this condition and state what steps, if any, were taken by Hardin County to correct this condition.

ANSWER: A similar question has been asked by the Commission (Case No. 2007-00461) and answered with the District's response filed and receiving by the Commission on March 17, 2008 (See attached question 15). District staff specifically met with park manager to assist with methods to locate leaks, and found evidence of two leaks when arriving to talk to park manager.

Several letters had been sent to park owner, when District was still sending warning letters to highest leaking parks, notifying them that a tariff change had been filed, and, if they had to begin paying for leaking water, about how much the bill would be.

The particular MHC questioned has taken little action to fix leaks, and leak rate from the latest warning letter (May, 2008) has changed little. In the last six months, this MHC has averaged loss of 486,000 gallons per month. As any MHC park owner, they currently do not have to pay for any of this water, so there is little incentive for them to find and fix any leaks. Average water and sewer revenue loss to District per month for this MHC would be about \$3,840 or \$46,073 per year.

The District believes it has gone beyond any requirement to notify or help MHC find and repair leaks, who are non-customers of the District. The process to continually check leak rates, contact and meet with non-customers, to assist them finding leaks in their private lines, takes much needed staff time away from the District's other 9,700 water customers, to assist owners of 26 MHC's, who are not paying for leaked water or sewer. Also, it is not the District's practice to assist other water customers to find leaks in private plumbing, other than notifying them of possible higher than normal use and possible leak.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

- 15 a State whether any MHCs have requested assistance from Hardin County in locating leaks within their water lines
- b If so, state how the district handled these requests
- c Describe the assistance that Hardin County could provide and the costs for such assistance

ANSWER: a Yes, there were five (5) cases in which the District provided assistance in locating water leaks in MHCs;

b Parkside MHC - The District was contacted by Ms. Stephanie Wiseman, owner, 1855 Wilson Road and ask if the District would assist in finding leaks in the MHC At direction of the District's Board, District staff contacted Kentucky Rural Water Association (KRWA) and asked if KRWA would conduct a leak survey in the MHC KRWA agreed to do so at no charge to the District or the MHC The District and Ms Wiseman executed an agreement and the first phase of the survey was conducted on 18 January, 2008 The resulting report and a copy of the agreement is attached KRWA did not charge for the survey The second phase is scheduled for March 2008, as weather permits

Homestead - District staff met with Jerry of Homestead MHC on 27 August, 2007 Staff discussed possible methods and suggestions for locating leaks

*

Park Valley - District staff met with Stacey Haas, the park's maintenance man, on 28 August, 2007 District staff informed Mr Haas of possible methods for locating leaks Staff also informed Mr Haas of two (2) possible leaks that were visually found while District staff was driving to the meeting.

Paradise MHP: On October 4, 2007, the owner, Mr DeRuiter called and asked that we check his meter to make sure we were getting correct reading Mr Bruce and Mr Pyles of the District drove to the master meter and re-read meter and recorded the flow rate, and responded by letter dated October 10, 2007 We also called Mr DeRuiter and asked if we could assist him in looking for leaks He responded that he did not need assistance, but he and his son would continue looking for leaks

Rainbow MHP: On or about October 19, 2007 the owner called us and said he suspected several tenants were stealing water, causing leaked water amount to seem higher He provided a list of trailers that were occupied which we compared with our list of active accounts After determining that about six occupied trailers did not have an account with the District (14% of lots in park), those services were turned off and meters removed Mr Brett Pyles contacted Radcliff Assistant Police Chief William Wells On November 28, 2007 two Radcliff police officers met Mr. Pyles and two other District employees at Rainbow MHP and made contact with the persons that did not have an account with the District but were using water Two of the renters came in to the District and signed re-payment plans and opened accounts (see attached) The others apparently moved out without contacting the District or paying for back charges (The owner believed the District should be checking this on a regular basis However, the District does not have manpower or believes it should hire more persons, to monitor about 900 lots/renters to see if new persons have moved in or out, and have come in to District office to open an account)

c The District has incurred no cost for providing assistance other than the time of the employee(s) providing assistance

WITNESS Mr Brett Pyles, Operations Manager, HCWD I

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

May 19, 2008

Owner or Current Manager / Operator
Park Valley Mobile Home Park
c/o JCS Holding LLC
429 E Eastland St
Gallatin Tn 37066

CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - April 2008
Park Valley Mobile Home Park**

Dear Owner / Manager;

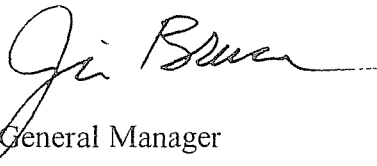
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of April, the loss rate is 91%, which was a total un-billed and wasted water amount of 107,900 gallons. This is a slight increase from the previous in the loss percentage. This means that for every 100 gallons being delivered to your park, about 91 is not being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

The Public Service Commission is still reviewing our proposed tariff. If approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$809 per month in added water and sewer charges.

This letter provides our fourth request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

3. Please state the steps taken by Hardin County to calibrate or ensure the accuracy (“calibrate”) the master meters used by the Mobile Home Communities and to calibrate the meters used for each individual Mobile Home Community lot, and the frequency of calibration.

ANSWER: These meters are not actually used by the MHC communities, or the District, for any purposes other than the District voluntarily checking loss rates in MHC, or when requested by the Commission for latest loss rates.

Latest test results for these meters has been asked by the Commission (Case No. 2007-00461) and answered with the District’s response filed and receiving by the Commission on March 17, 2008 (See attached question 8).

KAR 807 KAR 5:066 (Sections 13 ~ 17) sets forth meter testing and accuracy standards for all meters used for selling of water. When the District began tracking water loss, all MHC master meters were tested, and some replaced or repaired. None of these meters are currently being used to sell water, so the District does not believe there is any regulatory requirement to continue to test and check these meters on a regular basis.

Should the Commission approve the District’s tariff, and if ordered, the District would re-test all master meters again, and make any adjustments or repairs needed, as these meters would then be used for selling water, to an actual customer.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

8. Provide every master meter test result for each of the MHCs since January 1, 2007.

ANSWER: Requested information is attached. (Have provided test result of each MHC master meter, regardless of test date).

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

Master Meter Test Information									
Name	Address	Mtr. #	Installed	I/M/H	Overall	Test Date	Size (in.)	Parcel	
Brack Enterprises	871 Wilson	31634753	7/31/2006	99-101-100	100.5	6/23/2006	2	5-7390	
1343 Dixie	1343 Dixie	88542921	12/17/1999	99-100-99	100.5	11/16/1999	1	6-8934	
Woodland MHP	1501 Dixie	87630161	10/7/2005	98-100-99.3	99.65	7/9/1995	1	6-8848	
245 Globe	245 Globe	56018261	1/6/2000	new	new	1/6/2000	5/8x3/4	7-8989	
Dixie MHP	1740 Dixie	56889589	2/27/2007	99-101-100	100.5	2/26/2007	1-1/2	7-0510	
Park Valley Comm	1674 Dixie	31634750	3/5/2007	98-101-101	101	1/5/2007	2	7-1019	
616 Millcreek	616 Millcreek	34336943	2/19/2004	100-99-99.5	100.25	3/12/2002	3/4	7-1548	
D & J Rentals	652 Millcreek	91967624	2/19/2004	101-101-99.5	100.25	12/29/2003	5/8x3/4	7-1771	
Southland	402 Southland	88533002	6/10/2005	100.7-101.2-100.7	100.95	12/28/2004	5/8x3/4	7-1873	
Homestead	North	89075819	2/26/1998	100-101-99.2	100.9	2/26/1998	3/4	7-1990	
Homestead	South	62283668	1/14/2004	new	new	1/14/2004	1-1/2	7-1992	
Homestead	Center	91693583	2/26/1998	101-101-100	100.5	2/26/1998	1	7-1999	
Yarwood MHP	1190 Dixie	62396579	1/14/2004	new	new	1/14/2004	2	7-2200	
1170 Waterfield	1170 Waterfield	16511847	3/5/2007	100-100.5-100.4	100.45	8/28/2006	1	7-1717	
Lynch's MHP	1607 Wilson	15432625	9/27/2005	9809-99.5-99	99.25	7/28/2005	5/8x3/4	10-0940	
Lynch's MHP	1659 Wilson	15432627	9/27/2005	98.9-100-99.4	99.7	7/28/2005	5/8x3/4	10-1040	
Parkside Manor	1855 Wilson	56179052	12/15/2005	99-100-99.1	99.55	5/28/2002	1	10-1420	
Parkside Manor	1855 Wilson	002902	12/7/2005	98.5-99.5-101.2	100.35	12/15/2008	4	10-1320	
Duvall MHP	1255 Wilson	62552406	1/15/2004	new	new	1/15/2004	2	11-0612	
Masden MHP	Masden	15405028	12/22/2005	100-100.5-100.5	100.5	7/1/2005	2	11-1380	
Brentwood Estate	369 Elm	17573612	3/6/2008	99-100.4-99.2	99.8	11/1/2007	3/4	15-5880	
Brentwood Estate	369 Elm	16511863	3/6/2008	98-100-100.4	100.2	8/28/2006	1	15-5794	
Golden Rainbow	360 Hill	61239024	1/15/2004	new	new	1/15/2004	1-1/2	16-2498	
Combs Ln.	Combs Ln.	15666152	3/20/2006	100.9-101-100	100.5	12/14/2005	3/4	18-4140	

Country Lane	Country	15431809	9/27/2005	99-100-99.3	99.65	7/29/2005	1	18-7195
2600 Knox	2600 Knox	16291339	3/13/2006	98.1-100-99.6	99.8	1/26/2006	1	18-6181
2010 Hill	2010 Hill	35980380	2/5/1999	96-101-99.1	100.05	1/29/1999	3/4	18-7502
Rogersville MHP	Rogersville	30818382	5/3/2004	new	new	5/3/2004	3/4	20-3078
Rogersville MHP	Rogersville	61394785	5/3/2004	99-100-99	99.5	5/3/2004	1	20-2809
Raisor MHP	Hill	88532993	2/17/1999	100-101-98.9	99.95	2/9/1999	5/8x3/4	21-0221
Paradise MHP	1445 Hill	56741719	12/22/2005	new	new	12/6/2005	2	21-1366
Oak Hill MHP	1349 Hill	16511844	2/25/2008	100.2-101.5-100.3	100.9	8/28/2006	1	21-0265
455 Rogersville	455 Rogersville	16281190	2/21/2006	98.1-99-99.2	99.1	1/12/2006	1	22-7540
New indicates factory tested results not attached to history card								

4. Please state whether an MHP is notified on a monthly basis of the difference between the amount of water measured by the master meter for the MHP and the total amount of water provided to the individual units in the MHP, and the steps taken by Hardin County to correct the difference.

ANSWER: The District is not currently monitoring water loss in all 26 MHC's. When the Commission rejected its previous application (Case 2007-00461), the District decided that it could not commit the staff time it took to read an additional 30 master meters, and then manually segregate about 830 other meter readings from lot meters, and assign to each park, and then do the calculations. This process takes several hours a month from our Billing Specialist, who is already stressed for time to complete all billings for 9,700 other water and 8,700 other sewer customers who need to receive a bill on strict billing cycle deadlines.

As MHC park owners are currently not a customer of the District, they also do not pay a Customer Meter Charge (for any master meter), which recovers the cost for the District of reading, billing and collection of a water bill, and maintenance of the meter and meter service itself. The District's management made the decision based on the adequacy of the previous data and record, and the lack of action by previously notified park owners of leaks, to actually repair and fix leaks on a regular basis.

Any MHC owner could read their own master meter monthly (the District could and has provided instructions on this) or anytime to calculate and track their own water loss from their private lines.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

5. Hardin County's Answer to the PSC's First Data Request No. 2 provided copies of laboratory reports containing the results of the sampling of water present in the meter pits of eight current MHP lots. Please identify the mobile home communities from which these samples are collected and state whether this information was provided to the owners of the mobile home communities.

ANSWER: The addresses are listed in answer #4 in same data request response. This information was not directly provided to MHC owners, other than same information and response filed with intervenor's attorney and Commission.

The District historically has not had much success with MHC owners responding to sewage on ground. We have also had little or no response from the local health department after notifying them in writing of this concern or evidence of sewage on the ground.

The District's main concern, and most likely health risk, is its employees coming in direct physical contact with sewage water in meter pits. For this reason, most Distribution employees are provided an annual Hepatitis shot to protect against blood borne pathogens, and also equipment to manually pump out the water before touching the meter or equipment inside the meter pit. Equipment (called a sight tube) is also provided so reading can be taken under water, without having to touch the water with their hands.

If the District found an open water pipe (where meter was removed) with sewage water in the pit, it would notify the park owner, health department and PSC and turn off water to that location in accordance with 401 KAR 8:020, Section 2.[2] until the repairs were made.

This was same action District took with Dixie Mobile Home Park in 2007. Even with that notice, the MHC operator resisted turning off the water to residents, and asked for several extensions of time until plumbing repairs could be made (*Since then, that park has been closed, re-sold and has been re-developed with site built homes, replacing all water and sewer lines in park according to District standards, and have turned over to District for ownership, and provided dedicated utility easement access throughout the roads at that property*).

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

6. Please state the method used by Hardin County to determine the water loss for its individual customers.

ANSWER: The District complies with 807 KAR 5:006, Section 10(3) for monitoring a water customers water use. (See attached documentation and affidavit filed with the Commission in October, 2008, regarding this practice).

As stated in response to other questions, MHC owners are not a customer of the District, do not pay for any services or water used, and therefore, would not be subject to notice of deviations in water use, and do not receive or pay a water bill.

If the Commission were to approve the proposed tariff, the District would be required to monitor master mater water use, at each MHC, on a monthly basis and provide notice to those customers of unusual change in water use.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

AFFIDAVIT & VERIFICATION

The undersigned, Ms. Charlene Easter (Customer Service Manager) and Ms. Linda Thompson (Billing Specialist), hereby depose and attest that the Hardin County Water District No. 1 employs a process and procedure monthly to monitor customers' usage and said procedures are in place to draw to the District's attention unusual deviations in a customer's usage, and if a customer's usage is unduly high the District notifies the customer in writing, or other means, and that the attached documents provide actual evidence that this process is in place and is being practiced by the District.

Charlene Easter
Ms. Charlene Easter

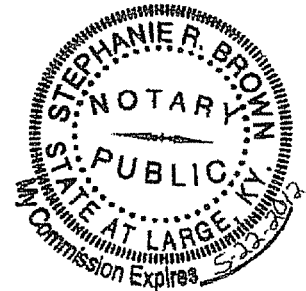
Linda Thompson
Ms. Linda Thompson

STATE OF KENTUCKY
COUNTY OF HARDIN

I, the undersigned, a Notary Public, do hereby certify that on this 28 day of October, 2008, personally appeared before me the above persons who being by me first sworn, subscribed to and acknowledged that they both represent the Hardin County Water District No. 1, a Kentucky Corporation

Stephanie R. Brown
NOTARY PUBLIC, STATE OF KENTUCKY
AT LARGE

My Commission Expires; 5-22-2012



DOOR HANGER

Hardin County Water District No. 1
1400 Rogersville Road, Radcliff, KY. 40160

Phone: 351-3222 or 862-4340

OFFICE HOURS: Monday, Tuesday, Wednesday and Friday, 8 AM to 4:30 PM
Thursday, 8 AM to 4:00 PM

NOTICE

PLEASE READ NEXT TO THE CIRCLED LETTER(S) BELOW TO SEE WHAT HAS CAUSED A CHANGE TO YOUR WATER SERVICE. YOU MAY NEED TO TAKE SOME ACTION OR CONTACT THE DISTRICT BASED ON WHAT ITEM IS CHECKED;

A	Your water was turned off for NON-PAYMENT. In order to re-establish service, payment for past due charges and fees will need to be made. Please contact us to find the amount owed. (Reconnected Fee = \$37 during day, \$46 after closing) WARNING: Turning on water without payment may result in a MISDEMEANOR or FELONY citation under KRS 514.060. Extra fees and charges will be added to this service account if the meter or other devices are tampered with.
B	Because of an emergency leak or other repair, we have had to turn off the water to this address. We are working on the repair and will have water turned back on as soon as possible. We apologize for any inconvenience
C	We have scheduled a repair to the water main in the street or service line that serves this property. This is a necessary repair and we apologize for any inconvenience. Please call if you have any questions. With no problems or complications, water should be back on at: _____ (Expected Time of Day)
D	In order to repair a leak on a water main or the service line to your meter, we had to dig up and disturb your lawn or landscaping. As soon as the weather and soil conditions permit, we will return to repair this. Please call if you have questions or concerns.
E	When we came to turn water back on to your building / house, we found water continued to run. This may be because of a leak in the plumbing or a faucet or appliance was left on. We turned off the water again to prevent flooding in the building and possible property damage. Please call us to arrange another Service Call to turn service back on. (Added Service Call Charges may apply)
F	We have checked your water use and it appears higher than normal. You may have a water leak. You may want to contact a plumber or your property owner to find and repair the leak. You may contact our office for suggestions on finding common leaks (See back for suggestions)
G	We have flushed fire hydrants or the water mains in your area. You may notice a rusty color or a milky look for several hours. This is normal and the water is safe to drink. It is caused by rusty sediment or air bubbles trapped in the water. If it does not clear up, please call our office
H	We were at your property today to replace your water meter. This is part of our routine Meter Testing & Inspection Program and was not because your meter was not working. The old meter has been replaced with another meter which was recently tested. If you have any questions, please call us
I	We had to repair the water main on your road. Kentucky Division of Water Regulations require that we take samples of the water after the repair and have it tested for the presence of bacteria and proper disinfection levels. Until we receive the test results back, A BOIL WATER ADVISORY has been issued for your area. It is ADVISED that you boil all water for bathing, drinking or cooking until the following DATE and TIME: _____ (Listen to your local radio station or call our office for more information)
J	OTHER INFORMATION OR REASON: Please see the back of this form for additional information or instructions

SEE BACK SIDE FOR ADDITIONAL INFORMATION

Date read 10-20-08

Date re-checked 10-23-08

Book number #08

Re-checked by: John

Account #	Name	Address	Readings
08-4120-03	Embry	691 Franklin	8617-3049 MR
Last four: 2532		High Low/stuck	8660 Don't match Need reading
24060406	Pacetti	644 Independence	8461-8475
(08-4660)			8476 OK
Last four: 1470		High Low/stuck	Don't match Need reading
80371206	Sheppard	2131 Boundary	940-1125
(08-4914)			NT 1125
Last four: 8880		High Low/stuck	Don't match Need reading
08-5380-01	Love	855 Deanna	4950-5088
			TS 5101 LT
Last four: 8462		High Low/stuck	Don't match Need reading
08-5500-01	musiak	3002 Terry	1227-1274
			NT 1276
Last four: 8424		High Low/stuck	Don't match Need reading
4841128	Stamper	858 Shelby	8385-8385
(08-5620)			8387
Last four: 6069		High Low/stuck	Don't match Need reading
08-5700-04	Eiland	876 Shelby	6957-7066
			NT 7071
Last four: 8285		High Low/stuck	Don't match Need reading
08-6030-01	Plants	104 Dailey	MR 3651 3608
			3613
Last four: 8486		High Low/stuck	Don't match Need reading
08-6520-06	Anderson	4022 Centennial	2363-2491
			NT 2502
Last four: 4854		High Low/stuck	Don't match Need reading
66300628	Jackson	2508 Hilltop 3	49-98
(08-7480)			RL-1 100 NT
Last four: 1976		High Low/stuck	Don't match Need reading
64250710	Carter	2508 Hilltop 1	36-8
(08-7540)			ENT 8
Last four: 1977	18341807	High Low/stuck	Don't match Need reading
27080706	Whitehead	2518 Hilltop 3	95-0
(08-7580)			RL-2 135
1962			need reading

Mike *

Robt

7. Please state whether Hardin County's customers, excluding customers living in MHP's, have meters that are inaccessible because they are under steps or behind a fence and state the number of such inaccessible meters.

ANSWER: The District does not have an actual number, but believes it is less than 12. There is one apartment building, where all the meters are located directly inside entrance door, under a stairwell. There are a few commercial business where meters are located indoors, but the District has been provided a key to access the meters.

It has been the District's practice that when a commercial meter location is on private property, and there is an access problem, that the District has relocated the meter out to the road right of way nearest the water main, in accordance with its tariff on meter locations. This has been when there is one building or customer, not multiple billed customers within one lot on private property.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1