

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

**RECEIVED**  
OCT 30 2014  
PUBLIC SERVICE  
COMMISSION

**In the matter of:**

**CANNONSBURG WATER DISTRICT 'S            )**  
**UNACCOUNTED FOR WATER LOSS            )** **Case No. 2014-00267**  
**REDUCTION PLAN, SURCHARGE AND        )**  
**MONITORING**

**MOTION FOR ENLARGEMENT OF TIME**

Comes now the applicant, Cannonsburg Water District by a and through counsel and hereby moves the Kentucky Public Service Commission for Order enlarging the time frame to submit documents requested by PSC in the above referenced matter states as follows:

On October 17th, Counsel for Cannonsburg Water District received a phone call and an email regarding the Commission's Staff First Information Request To Cannonsburg Water District pertaining to verification of Engineering costs arising out of Cannonsburg Water District's Unaccounted-For Loss Reduction Plan, Surcharge and Monitoring Plan. Immediately after I was contacted by the PSC regarding the information request, I contacted Cannonsburg regarding the same. Neither myself or Cannonsburg ever received prior emails or hard copies of the information request.

The same day that same day my 86 year old mother took ill and has been bed fast ever since. I am the primary care giver of my mother and disabled sister. Just this week have I been able to find someone to stay with my family members so that I can return to my office. Having said that enclosed is relevant documentation from E. L. Robinson Engineering which answers some of the questions proffered by the PSC.

I WHEREFORE, the applicant Cannonsburg Water District, formally requests an Order Am authorizing Cannonsburg until November 5, 2015 to tender the information requested.

Respectfully submitted,

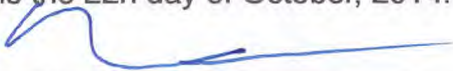


Kevin P. Sinnette  
2706 Louisa Street  
P.O. Box 532  
Catlettsburg, KY 41129  
Tel. (606) 739-6774  
Fax (606) 739-9125

A copy of the foregoing Motion was sent, postage prepaid to:

Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

This the 22n day of October, 2014.



Kevin P. Sinnette



Kevin Jinnette  
copy

October 17, 2014

Mr. Danny Clarkston- General Manager  
Cannonsburg Water District  
1606 Cannonsburg Road  
Ashland, Kentucky 41102

**RE: KY Public Service Commission**  
**Case No. 2014-00267- Water Loss Surcharge Spending Plan**  
**Response to PSC Staff "First Information Request", Questions dated 9/26/14**

Dear Mr. Clarkston:

Please find enclosed herewith our responses to PSC's Question Numbers 4 and 5 in the latest PSC request referenced above.

***Question:** 4.a. ....According to the E.L. Robinson Engineering May 9, 2014 Invoice (#1), Cannonsburg was billed for 15 hours for a Professional Engineer and 47.25 hours for an Engineering CADD Technician.*

- *Provide detailed description of services that were provided to Cannonsburg by the Professional Engineer and Engineering CADD Technician.*

**Answer:** Invoice No 1 has a description of services performed. "Attended meeting in KY PSC Offices in Frankfort, complete final plans/specs, bidding assistance with installation of Monitor and Bypass Meters". **See below for a more detailed description.**

Meeting w/Clarkston to discuss preliminary project scope and obtain copies of background info. Meeting #2 w/Clarkston to go over responses to PSC request for info prior to meeting in Frankfort. Typed answers to PSC's email "20 questions from Kathy Gillum" and provided to client via email. Attended meeting in KY PSC Office in Frankfort. Received post PSC meeting email from A. Ramser detailing PSC's requirements for water loss meters maps, bid documents. Began engineering field work with visits to all bypass and master meter sites with client. Collected meter bill of materials lists from client.

- *Provide documentation showing the hours of each employee.*

**Answer:** Refer to attached "Labor Hours by Project" Report for Invoice #1. The hours noted in the Report match Invoice #1 and are 15 hours **Professional Engineer** (Paul Amburgey) and 47.25 hours **CADD Technician** (Kevin Conn).

***Question:** 5.a. ....According to the E.L. Robinson Engineering June 10, 2014 Invoice( #2), Cannonsburg was billed for 23.75 hours for a Professional Engineer and 131.25 hours for an Engineering CADD Technician.*

(CONTINUED NEXT PAGE)

Mr. Danny Clarkston  
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- *Provide detailed description of services that were provided to Cannonsburg by the Professional Engineer and Engineering CADD Technician.*

**Answer:** The Engineers Invoice provides a description of services rendered. See below for more detailed description.

Begin final design plans/specs, bidding documents. CADD drafting of plans. Complete specifications. Checking of plans and go over with client. Printed multiple sets of plans and specs for bidding. Notified potential bidders by fax. Provided plans/specs to contractors, suppliers. Submitted copy of plans /specs to PSC. Prepared Advertisement for Bids, arranged for publish in Ashland paper.

- *Provide documentation showing the hours of each employee.*

**Answer: The Engineer's billing is "cumulative" each month which follows Federal/State funding agency guidelines. This format allows the client, funding agency to keep track of total billings. The current month billing in man-hours is added to the previous month's man-hours. The current Invoice is then reconciled by crediting out the previous billing to date by adding "Less Previous Invoices" at the bottom of Invoice.**

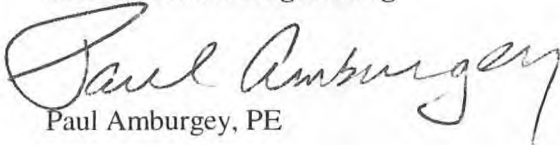
Refer to attached "Labor Hours by Project" Report for Invoice #2. The man-hours actually billed by Invoice # 2 dated June 10, 2014 is only 8.75 hours for Professional Engineer (23.75 hours Invoice # 2 less 15 hours Invoice #1). For the Engineering Technician, the man-hours actually billed is only 84 hours (131.25 hours Invoice # 2 less 47.25 hours Invoice #1).

The information provided in this letter and the attachments is true and accurate, to the best of my knowledge, information and belief.

Should you require additional questions, please call.

Sincerely,

**E. L. Robinson Engineering**



Paul Amburgey, PE

cc: Kevin R. Sinnette- Attorney for Cannonsburg Water District