COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF NORTHERN)	
KENTUCKY WATER DISTRICT FOR A)	
DEVIATION FROM 807 KAR 5:006, SECTION)	CASE NO. 2016-00427
26(6)(B))	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO NORTHERN KENTUCKY WATER DISTRICT

Northern Kentucky Water District ("Northern Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due within 14 days of the date of this request. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Northern Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Northern Kentucky fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filling a paper containing personal information, Northern Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

- 1. Refer to the Application, page 5, which states: "[the] District employs eight (8) full-time employees that perform meter inspections. To inspect all meters in the system each year would require adding twelve (12) more full-time staff. Combined with the nine (9) additional staff for valve inspections, this represents an increase of 14% of the District's total staff." Additionally, page 3 of the Application states that there are approximately two full-time employees who perform valve inspections.
- a. Provide the total number of staff members currently employed by Northern Kentucky.
- b. Provide a complete list of all staff members, by job title, currently employed by Northern Kentucky.

- c. Confirm that the eight full-time employees who perform meter inspections are dedicated to the sole purpose of inspecting meters.
- d. Provide the job title, description, current pay rates, and benefits that are provided to each of the eight full-time employees who perform meter inspections.
- e. Provide the number of hours, with overtime hours separately stated, that each full-time employee who performs meter inspections worked during the calendar year 2016, and separately state the number of those hours that were dedicated to meter inspections.
- f. Confirm that the two full-time employees who perform valve inspections are dedicated to the sole purpose of performing valve inspections.
- g. Provide the job title, description, current pay rates, and benefits that are provided to the two full-time employees who perform valve inspections.
- h. Provide the number of hours, with overtime hours separately stated, that each full-time employee that performs valve inspections worked during the calendar year 2016, and separately state the number of those hours that were dedicated to valve inspections.
- 2. Refer to the Application, page 5, which states that the average annual salary and benefits per field employee is \$55,250.
- a. Provide the calculation of the average annual salary and benefits stated above.
- b. Provide the gross pay, hourly rate, hours worked, overtime hours worked, and job title of each position that was used to generate this calculation.

- Provide the number of meter inspections that were completed for the year ended December 31, 2016.
- Provide the number of valve inspections that were completed for the year ended December 31, 2016.
- Refer to Northern Kentucky's response to item 1.b. of Commission Staff's
 First Request for Information ("Staff's First Request").
- a. Confirm that the response contains Northern Kentucky's proposed inspection schedule for its valves. If the response does not contain Northern Kentucky's proposed inspection schedule, state the proposed inspection schedule for valves.
- b. State whether the response contains Northern Kentucky's current inspection schedule for its valves. If the response does not contain Northern Kentucky's current inspection schedule, state the current inspection schedule for valves.
- c. Identify the individual or individuals who approved the decision to utilize Northern Kentucky's current inspection procedures for its valves and state when the policy became effective.
- d. For each individual identified in sub-part c. of this question, provide the job description and duties for the individual.
- 6. Refer to Northern Kentucky's response to item 2.c. of Staff's First Request.

 State the factors in support of Northern Kentucky's position that inspecting valves 36-inch and larger not less frequently than once every two years is reasonable.
- 7. Refer to Northern Kentucky's response to item 3 of Staff's First Request.

 State how long Northern Kentucky has been out of compliance with 807 KAR 5:006,

 Section 26(6)(b), with respect to its valves.

- 8. Identify the individual or individuals who approved the decision to utilize Northern Kentucky's current inspection procedures for its meters and meter setting, and state when the policy became effective. For each individual, provide the job description and duties for the individual.
- Refer to Northern Kentucky's response to item 9 of Staff's First Request.
 State how long Northern Kentucky has been out of compliance with 807 KAR 5:006,
 Section 26(6)(b), with respect to its meters and meter settings.
- 10. Provide a copy of the inspection procedures used to assure safe and adequate operation of Northern Kentucky's facilities and compliance with KRS Chapter 278 and 807 KAR Chapter 5 adopted by Northern Kentucky. If the inspection procedures for meters, meter settings, or valves, of any size or type, have been modified since January 1, 2010, state each modification.
- 11. Refer to 807 KAR 5:006, Section 26(3), which states: "Appropriate records shall be kept by a utility to identify the inspection made, the date and time of inspection, the person conducting the inspection, the deficiencies found, and the action taken to correct the deficiencies." Provide the following:
- a. Northern Kentucky's most recent inspection record for each valve
 16-inch or larger:
- b. By year, for the years 2010 through 2016, the number of valves 16-inch or larger in Northern Kentucky's system, the number of inspections conducted by Northern Kentucky of valves 16-inch or larger, and the number of valves found to have deficiencies. By year, for the same period, provide a schedule that summarizes the

number of deficiencies found during the inspections by type of deficiency and the action necessary to correct the deficiency.

- c. By year, for the years 2010 through 2016, the number of valve failure or damage in valves 16-inch or larger in Northern Kentucky's system discovered during an attempt to use the valve while not conducting an inspection. By year, for the same period, provide a schedule that summarizes the deficiencies determined to be responsible for the failures, the action necessary to correct the deficiency, and whether the valve had been inspected within 12 months prior to the failure.
- d. By year, for the years 2010 through 2016, the number of valves smaller than 16-inch in Northern Kentucky's system, the number of inspections conducted by Northern Kentucky of valves smaller than 16-inch, and the number of valves found to have deficiencies. By year, for the same period, provide a schedule that summarizes the number of deficiencies found during the inspections by type of deficiency and the action necessary to correct the deficiency.
- e. By year, for the years 2010 through 2016, the number of valve failures or damage in valves smaller than 16-inch in Northern Kentucky's system discovered during an attempt to use the valve while not conducting an inspection. By year, for the same period, provide a schedule that summarizes the deficiencies determined to be responsible for the failures, the action necessary to correct the deficiency, and whether the valve had been inspected within 12 months prior to the failure.

John S. Lyons

Acting Executive Director
Public Service Commission

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DATED SEP 0 7 2017

cc: Parties of Record

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