

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO THE	)	
MEASURING, RECORDING, AND REPORTING	)	CASE NO.
OF WATER LOSS BY KENTUCKY'S	)	2018-00394
JURISDICTIONAL WATER UTILITIES	)	

ORDER

By Order dated December 18, 2018, the Commission initiated this proceeding to investigate the adequacy of the methods used by Kentucky's jurisdictional water utilities to measure, record, and report their water loss.<sup>1</sup> The December 18, 2018 Order stated that the Commission was aware that some jurisdictional water utilities were having difficulty properly measuring and reporting their water loss, as required by statute and regulation.<sup>2</sup> Due to these issues, the Commission is providing guidance to jurisdictional water utilities regarding the reporting of water loss and, in order to assist in proper measurement and recording, is providing an updated water loss form for measuring and tracking this loss.

The December 18, 2018 Order included a proposed revised Water Use & Loss Calculation Form (the Commission Form) in Appendix A,<sup>3</sup> detailed usage instructions on how to use the updated Commission Form in Appendix B,<sup>4</sup> and, in Appendix C the

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<sup>1</sup> Dec. 18, 2018 Order (Ky. PSC Dec. 18, 2018) at 1.

<sup>2</sup> *Id.* at 5.

<sup>3</sup> Dec. 18, 2018 Order, Appendix A at 1 of 1.

<sup>4</sup> Dec. 18, 2018 Order, Appendix B at 1–3.

Commission attached questions for each jurisdictional water utility to respond to, including but not limited to, the following: identify how each utility measures, calculates, and tracks water loss; whether the utility had questions, concerns, or suggested improvements for either the updated Commission Form or how the information in the updated Commission Form would be incorporated into future annual reports; and, whether the utilities thought it was reasonable, proper, and appropriate for the Commission to require jurisdictional water utilities to maintain and use the updated Commission Form.<sup>5</sup> Approximately 137 jurisdictional water utilities filed responses and suggestions in the pending case between January 7, 2019, and January 23, 2019.<sup>6</sup>

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General), filed a motion to intervene in the pending case on January 3, 2019, and the Commission issued an Order granting the intervention on January 11, 2019. The Attorney General did not file any further pleadings or comments in the pending case.

The Commission issued an Order on February 21, 2019, providing for any intervenor or utility to file final comments or to request a formal conference to discuss any issues or questions concerning the pending case by March 25, 2019. The February 21, 2019 Order further stated that if there were no requests to conduct a formal conference, then the case would be submitted to the Commission for a decision on the record. No intervenor or utility filed comments or requested a formal conference.

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<sup>5</sup> Dec. 18, 2018 Order, Appendix C at 1–2.

<sup>6</sup> See [https://www.psc.ky.gov/PSC\\_WebNet/ViewCaseFilings.aspx?case=2018-00394](https://www.psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2018-00394).

On June 12, 2019, the Executive Director submitted a letter into the record asserting that the Commission had received written comments from the American Water Works Association (AWWA). The letter attached a copy of the written comments and further stated that if any party to the case was interested in filing a response to these comments, then the Commission would allow responses to be filed into the record within ten days of receipt of the letter. No party filed a response to the comments. On July 22, 2019, the Executive Director submitted a clarifying letter into the record stating that it had been advised that the prior written comments that had been filed into the record on June 12, 2019, were not officially approved by the AWWA, but instead were drafted by Mr. William Jernigan, P.E., independent of his affiliation with AWWA. The letter further stated that if any party to the case was interested in filing a response to Mr. Jernigan's comments, then the Commission would allow responses to be filed into the record within ten days of receipt of the letter. No party filed a response to the comments. The Commission finds that the case record is complete, and the matter now stands for a decision.

### DISCUSSION

As the Commission stated in the December 18, 2018 Order, the Commission has plenary authority under KRS 278.040 to regulate the rates and services of jurisdictional utilities and to enforce the provisions of KRS Chapter 278. KRS 278.030 requires every utility to furnish "adequate, efficient and reasonable" service. KRS 278.260 permits the Commission, on its own motion, to investigate any act or practice of a utility that affects or is related to the service of a utility. KRS 278.280(1) further permits the Commission, after conducting such investigation and finding that a practice is unreasonable, unsafe,

improper, or inadequate to determine the reasonable, safe, proper, or adequate practice or methods to be observed and to fix the same by order, rule, or regulation. KRS 278.230 permits the Commission to inspect the books and records of any jurisdictional utility, provides that jurisdictional utilities' books and records shall be available to the Commission, and permits the Commission to require jurisdictional utilities to file "reports . . . or other information" that the Commission reasonably requires.

KRS 278.280(2) directs the Commission to prescribe rules for the performance of services by utilities. Pursuant to this authority, the Commission promulgated 807 KAR 5:006, Section 4(2), which includes a requirement that each jurisdictional utility file an annual report using the reporting forms available on the Commission's website at <http://psc.ky.gov/>. This annual report requires jurisdictional water utilities to provide information regarding their total line loss, including "unaccounted-for" water.<sup>7</sup>

The Commission has defined "unaccounted for water," pursuant to 807 KAR 5:067, Section 1(7) as:

"Unaccounted for water" means the volumetric sum of all water purchased and produced by the utility less the volume of water:

- (a) Sold;
- (b) Provided to customers without charge as authorized by the utility's tariff; and

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<sup>7</sup> See generally *Application of Graves County Water District for Approval of Construction and Issuance of a Certificate of Convenience and Necessity for the Purchase and Installation of Automated Meter Reading Equipment*, Case No. 2011-00233 (Ky. PSC Nov. 3, 2011), Order at 2 n.5. The information provided can also be used to calculate other important information, such as nonrevenue water. See *Id.* Nonrevenue water is defined as "those components of system input volume that are not billed and produce no revenue; equal to unbilled authorized consumption plus apparent losses plus real losses." *Id.* (citing American Water Works Association, *Water Audits and Loss Control Programs* (3d ed. 2009) at 271).

(c) Used by the utility to conduct the daily operation and maintenance of its treatment, transmission, and distribution systems.

Thus, unaccounted-for water loss is “the difference of the total amount of water produced and purchased and the sum of water sold, water used for fire protection purposes,<sup>8</sup> and water used in treatment and distribution operations (e.g., backwashing filters, line flushing).”<sup>9</sup> Generally speaking, the unaccounted-for water loss is the result of line breaks and leaks, inaccurate meters, tank overflows, excavation damages, and theft.<sup>10</sup>

Pursuant to KRS 278.280(2), the Commission also promulgated 807 KAR 5:066, Section 6(3), which states in part:

Except for purchased water rate adjustments for water districts and water associations, and rate adjustments pursuant to KRS 278.023(4), for rate making purposes a utility’s unaccounted-for water loss shall not exceed fifteen

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<sup>8</sup> When provided without charge pursuant to the utility’s tariff.

<sup>9</sup> *Application of Cannonsburg Water District for (1) Approval of Emergency Rate Relief and (2) Approval of the Increase in Nonrecurring Charges*, Case No. 2011-00217 (Ky. PSC Feb. 27, 2012), Order at 5 n.12.

<sup>10</sup> See, e.g., *Application of Ledbetter Water District for an Alternative Rate Adjustment*, Case No. 2018-00117 (Ky. PSC Sept. 10, 2018), Order at 3 (excessive water loss caused by large leak); *Electronic Application of Hardin County Water District No. 2 for a Declaratory Order that Sample Testing Satisfies the Testing Requirements of 807 KAR 5:066, Section 16(1) or, in the Alternative, for an Order Granting a Deviation [There]From*, Case No. 2016-00432 (Ky. PSC March 22, 2018), Order at 7-8 n.28 (noting potential loss from defective meters); *Electronic Application of McCreary County Water District for Authorization to Execute Lease-Purchase Agreement and Related Relief*, Case No. 2018-00038 (Ky. PSC June 28, 2018), Order at 5 (granting Certificate of Public Convenience and Necessity (CPCN) based, in part, on project “reduc[ing] unaccounted-for water loss because of quicker detection of water leaks, meter tampering, and theft”); *Application of Cumberland Falls Highway Water District for Approval of Financing and Issuance of a Certificate of Convenience and Necessity*, Case No. 2017-00268 (Ky. PSC Aug. 14, 2017), Order at 2 (approving CPCN based, in part, on finding that project will lower water loss by replacing leak-prone lines); *Application of Mountain Water District for an Adjustment of Water and Sewer Rates*, Case No. 2014-00342 (Ky. PSC Oct. 9, 2015), Order at 11 (noting utility representation that excessive water loss was attributable to “inaccurate meters, theft of service, and infrastructure failure”); *Alternative Rate Filing of Eastern Rockcastle Water Association, Inc.*, Case No. 2014-00385 (Ky. PSC May 15, 2015), Order at 6-7 (noting loss from inaccurate meter); *Application of Hardin County Water District No. 1 to Modify Water Utility Tariff of Master Meters for Billing Multi-Unit Residential Properties*, Case No. 2009-00113 (Ky. PSC Oct. 22, 2010), Order at 2 (noting that stolen water contributes to water loss); *Hardin County Water District No. 1’s Proposed Tariff Allowing the Use of Master Meters in Manufactured Housing Communities*, Case No. 2007-00461 (Ky. PSC Aug. 14, 2008), Order at 2 (same).

(15) percent of total water produced and purchased, excluding water used by a utility in its own operations. Upon application by a utility in a rate case filing or by separate filing, or upon motion by the commission, an alternative level of reasonable unaccounted-for water loss may be established by the commission. A utility proposing an alternative level shall have the burden of demonstrating that the alternative level is more reasonable than the level prescribed in this section.

The policy implemented by this regulation is “intended to serve as an incentive to promote efficient management.”<sup>11</sup> Excessive water loss is a potential warning sign of the deteriorating financial health and well-being of a jurisdictional water utility.<sup>12</sup> Water loss is lost potential revenue,<sup>13</sup> and excessive water loss can have many negative effects, from higher rates for consumers<sup>14</sup> to the ultimate failure<sup>15</sup> of a water utility. Moreover, to the extent excessive water loss is the result of poor infrastructure, it may reflect the potential for health risks from contaminants infiltrating the water system.<sup>16</sup> The annual reporting form for jurisdictional water utilities, filed pursuant to 807 KAR 5:006, Section

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<sup>11</sup> *In the matter of the Notice by Lake Village Water Association, Inc., of a Tariff Amendment Adjusting Rates and Imposing Construction Surcharge*, Case No. 89-075 (Ky. PSC Jan. 29, 1990), Order at 5.

<sup>12</sup> *See generally Electronic Application of Estill County Water District No. 1 for Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2017-00176 (Ky. PSC Dec. 20, 2017), Order at 4.

<sup>13</sup> *Electronic Application of Hardin County Water District No. 2 for a Declaratory Order that Sample Testing Satisfies the Testing Requirements of 807 KAR 5:066, Section 16(1) or, in the Alternative, for an Order Granting a Deviation [There]From*, Case No. 2016-00432 (Ky. PSC March 22, 2018), Order at 7-8 n.28 (noting that water loss can decrease revenue, which is “ultimately borne by the consumer in the form of higher rates.”).

<sup>14</sup> *Id.*

<sup>15</sup> *See Lovelaceville Water Company Request to Abandon*, Case No. 2014-00136 (Ky. PSC Oct. 31, 2014), Order at 5 (citing a “significant water loss rate,” along with poor infrastructure and low customer count as causes for the water utility being unable to continue operations).

<sup>16</sup> *Application of Hardin County Water District No. 1 to Modify Water Utility Tariff of Master Meters for Billing Multi-Unit Residential Properties*, Case No. 2009-00113 (Ky. PSC Oct. 22, 2010), Order at 2; *see also Hardin County Water District No. 1’s Proposed Tariff Allowing the Use of Master Meters in Manufactured Housing Communities*, Case No. 2007-00461 (Ky. PSC Aug. 14, 2008), Order at 2 (noting health risks from inadequate infrastructure and stolen water).

4(2), specifically seeks information regarding water loss in order to implement 807 KAR 5:066 and its underlying policies.

The Commission has thoroughly reviewed and taken into consideration the approximately 137 jurisdictional water utility responses and suggested improvements<sup>17</sup> when finalizing the updated Commission Form and written instructions, attached as Appendix A and B, respectively. According to the responses, the vast majority of jurisdictional water utilities find it reasonable to use and maintain the updated Commission Form to measure, record, and report water loss.<sup>18</sup> Furthermore, a substantial portion of the jurisdictional water utilities agree that knowing the actual water loss is vital to running an efficient water district because water loss can have detrimental effects such as higher rates to consumers, health risks, and potentially the ultimate failure

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<sup>17</sup> See [https://www.psc.ky.gov/PSC\\_WebNet/ViewCaseFilings.aspx?case=2018-00394](https://www.psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2018-00394).

<sup>18</sup> See, e.g., Fleming County Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 8, 2019); Boone County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 8, 2019); Judy Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 8, 2019); West Shelby Water District's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Muhlenberg County Water District #3's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Whitley County Water District #1's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); North McLean County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 10, 2019); East Daviess County Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 10, 2019); Cawood Water District's Response to the Dec. 18, 2018 Order (filed Jan. 10, 2019); Farmdale Water District's Response to the Dec. 18, 2018 Order (filed Jan. 10, 2019); Laurel County Water District #2's Response to the Dec. 18, 2018 Order (filed Jan. 11, 2019); Adair County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 14, 2019); East Logan Water District's Response to the Dec. 18, 2018 Order (filed Jan. 14, 2019); Monroe County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 15, 2019); Peaks Mill Water District's Response to the Dec. 18, 2018 Order (filed Jan. 15, 2019); West McCracken Water District's Response to the Dec. 18, 2018 Order (filed Jan. 16, 2019); Jackson County Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 16, 2019); Kentucky American Water's Response to the Dec. 18, 2018 Order (filed Jan. 17, 2019); See also: [https://www.psc.ky.gov/PSC\\_WebNet/ViewCaseFilings.aspx?case=2018-00394](https://www.psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2018-00394).

of a water utility.<sup>19</sup> Finally, many of the jurisdictional water utilities emphasized that it would be reasonable for all jurisdictional water utilities to use the updated Commission Form because it would bring consistency to how water loss is measured, recorded, and reported across the state of Kentucky.<sup>20</sup>

The Commission would note that there are numerous jurisdictional water utilities that proposed for other factors to be considered when reviewing water loss percentages including but not limited to the following: miles, age, and type of pipeline; amount of infrastructure; topography of the service area; meter and billing system accuracy; whether the jurisdictional water utility is a producer or purchaser of water; operating pressures;

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<sup>19</sup> See, e.g., Parksville Water District's Response to the Dec. 18, 2018 Order (filed Jan. 8, 2019); West Shelby Water District's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Reid Village Water District's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Farmdale Water District's Response to the Dec. 18, 2018 Order (filed Jan. 10, 2019); Cumberland Falls Highway Water District's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Montgomery County Water District #1's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Farmdale Water District's Response to the Dec. 18, 2018 Order (filed Jan. 10, 2019); Symsonia Water District's Response to the Dec. 18, 2018 Order (filed Jan. 10, 2019); Laurel County Water District #2's Response to the Dec. 18, 2018 Order (filed Jan. 11, 2019); Knox County Utility Commission's Response to the Dec. 18, 2018 Order (filed Jan. 14, 2019); Monroe County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 15, 2019); West McCracken Water District's Response to the Dec. 18, 2018 Order (filed Jan. 16, 2019); Jackson County Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 16, 2019); Kentucky American Water's Response to the Dec. 18, 2018 Order (filed Jan. 17, 2019); See Also: [https://www.psc.ky.gov/PSC\\_WebNet/ViewCaseFilings.aspx?case=2018-00394](https://www.psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2018-00394).

<sup>20</sup> See, e.g., Boone County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 8, 2019); Whitley County Water District #1's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Cannonsburg Water District's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Whitley County Water District #1's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); East Daviess County Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Kirksville Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Rowan Water, Inc.'s Response to the Dec. 18, 2018 Order (filed Jan. 9, 2019); Jessamine County Water District #1's Response to the Dec. 18, 2018 Order (filed Jan. 10, 2019); East Daviess County Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 10, 2019); North Shelby Water Company's Response to the Dec. 18, 2018 Order (filed Jan. 11, 2019); South Logan Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 14, 2019); Western Rockcastle Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 14, 2019); Breathitt County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 14, 2019); Peaks Mill Water District's Response to the Dec. 18, 2018 Order (filed Jan. 15, 2019); Jessamine-South Elkhorn Water District's Response to the Dec. 18, 2018 Order (filed Jan. 17, 2019); See also: [https://www.psc.ky.gov/PSC\\_WebNet/ViewCaseFilings.aspx?case=2018-00394](https://www.psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2018-00394).

number of customers; etc.<sup>21</sup> The Commission intends to continue adhering to 807 KAR 5:066, Section 6(3), which states that for ratemaking proposes a utility's unaccounted-for water loss shall not exceed fifteen (15) percent. With that said, the Commission would direct these jurisdictional water utilities to 807 KAR 5:066, Section 6(3), in which a jurisdictional water utility can file an application or motion that requests an alternative level of reasonable unaccounted-for water loss to be established by the Commission. However, under this regulation, a utility proposing an alternative level of water loss shall have the burden of demonstrating that the alternative level is more reasonable than the required 15 percent.<sup>22</sup>

The Commission is optimistic that the updated Commission Form, coupled with the detailed written instructions, will provide the guidance to better allow jurisdictional water utilities to properly measure, record, and report its water loss. The Commission will incorporate additional training on the updated Commission Form into the water training seminars that are conducted by the Commission periodically throughout the year, as well as post an educational video tutorial on the Commission's website next to the updated Commission Form.<sup>23</sup> Furthermore, in order to achieve efficiency, the Commission will update the Water Statistics page of the annual report that must be filed pursuant to 807

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<sup>21</sup> See, e.g., Mountain Water District's Response to the Dec. 18, 2019 Order (filed Jan. 9, 2019); Oldham County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 11, 2019); Levee Road Water Association's Response to the Dec. 18, 2018 Order (filed Jan. 11, 2019); Carroll County Water District #1's Response to the Dec. 18, 2018 Order (filed Jan. 11, 2019); Southern Water and Sewer District's Response to the Dec. 18, 2019 (filed Jan. 11, 2019); Henry County Water District #2's Response to the Dec. 18, 2018 Order (filed Jan. 14, 2019); Simpson County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 15, 2019); Butler County Water System, Inc.'s Response to the Dec. 18, 2018 Order (filed Jan. 15, 2019); Warren County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 15, 2019); Martin County Water District's Response to the Dec. 18, 2018 Order (filed Jan. 16, 2019).

<sup>22</sup> 807 KAR 5:066, Section 6(3).

<sup>23</sup> See <https://www.psc.ky.gov/Home/UtilForms>.

KAR 5:006, Section 4(2), to be identical to the updated Commission Form. This will allow for the easy transfer of required information by the jurisdictional water utilities.

Finally, the Commission, pursuant to KRS Chapter 13A, will promulgate regulations that require jurisdictional water utilities to use the updated Commission Form to properly measure, record, and report water loss. The Commission strongly encourages the jurisdictional water utilities, prior to the promulgation of regulations adopting the Commission Form, to utilize the updated Commission Form to measure, record, and report water loss in the interim. At this time, the Commission will not require all jurisdictional water utilities to file the updated Commission Form with the Commission unless it has been directly ordered to do so pursuant to an Order or inspection report. Therefore, all jurisdictional water utilities that have been ordered to submit water loss reports to the Commission will need to use the revised Commission Form.<sup>24</sup> The Commission will also revise the annual report to be identical to the updated Commission Form pursuant to KRS 13A.

Having reviewed the evidentiary record and being otherwise sufficiently advised, the Commission finds that the updated Commission Form and instructions will provide assistance to jurisdictional water utilities in measuring, recording, and reporting water

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<sup>24</sup> Including but not limited to the following: Big Sandy Water District, Black Mountain Utility District, Cannonsburg Water District, Cawood Water District, Christian County Water District, Cumberland Falls Highway Water District, Edmonson County Water District, Elkhorn Water District, Estill County Water District, Farmdale Water District, Henderson County Water District, Hyden-Leslie County Water District, Jonathon Creek Water District, Knox County Utility Commission, Madison County Utilities District, Martin County Water District, Morgan County Water District, Muhlenberg County Water District, Parksville Water District, Peaks Mill Water District, Rattlesnake Ridge Water District, Southern Water and Sewer District, West Carroll Water District, Bronston Water Association, Kentucky-American Water Company (Southern Division), Jackson County Water Association, Kirksville Water Association, Inc., and North Manchester Water Association, Inc..

loss, and also provide consistency as to how water loss is measured, recorded, and reported across the state of Kentucky.

IT IS HEREBY ORDERED that:

1. The updated Commission Form and the written instructions for jurisdictional water utilities to utilize are attached to this Order as Appendix A and B, respectively.

2. The jurisdictional water utilities shall collect and maintain all records necessary to accurately measure, record, and report its water loss.

3. The jurisdictional water utilities, as listed in footnote 24 above, that are under the requirement to submit water loss reports to the Commission shall use the updated Commission Form as set forth in Appendix A.

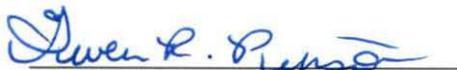
4. The investigation of the measurement, recording, and reporting of water loss of Kentucky's jurisdictional water utilities is hereby closed and will be removed from the Commission's docket.

5. Nothing contained herein shall prevent the Commission from entering further Orders in this matter.

By the Commission

ENTERED  
NOV 22 2019  
KENTUCKY PUBLIC  
SERVICE COMMISSION

ATTEST:

  
Executive Director

Case No. 2018-00394

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2018-00394 DATED **NOV 22 2019**

# PUBLIC SERVICE COMMISSION

## Monthly Water Loss Report

Water Utility:

For the Month of:  Year:

LINE #	ITEM	GALLONS (Omit 000's)
1	<b>WATER PRODUCED AND PURCHASED</b>	
2	Water Produced	
3	Water Purchased	
4	<b>TOTAL PRODUCED AND PURCHASED</b>	-
5		
6	<b>WATER SALES</b>	
7	Residential	
8	Commercial	
9	Industrial	
10	Bulk Loading Stations	
11	Wholesale	
12	Public Authorities	
13	Other Sales (explain) _____	
14	<b>TOTAL WATER SALES</b>	-
15		
16	<b>OTHER WATER USED</b>	
17	Utility and/or Water Treatment Plant	
18	Wastewater Plant	
19	System Flushing	
20	Fire Department	
21	Other Usage (explain) _____	
22	<b>TOTAL OTHER WATER USED</b>	-
23		
24	<b>WATER LOSS</b>	
25	Tank Overflows	
26	Line Breaks	
27	Line Leaks	
28	Excavation Damages	
29	Theft	
30	Other Loss	
31	<b>TOTAL WATER LOSS</b>	-
32		
33	<b>Note:</b> Line 14 + Line 22 + Line 31 <b>MUST</b> Equal Line 4	
34		
35	<b>WATER LOSS PERCENTAGE</b>	
36	(Line 31 divided by Line 4)	0.00%

## APPENDIX B

### APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2018-00394 DATED **NOV 22 2019**

#### Instructions for the Public Service Commission Updated Commission Form

##### Water Produced and Purchased

All Lines: Omit the last three zeros into the cell.

Line 2: Provide the number of thousands of gallons of water produced by the utility for the corresponding month.

Line 3: Provide the number of thousands of gallons of water purchased by the utility from third-parties for the corresponding month.

Line 4: The total of Water Produced and Water Purchased. This row will automatically calculate if the preceding lines are correctly filled out.

##### Water Sales

Lines 7-13: Provide the number of thousands of gallons of water sold for each category listed.

Line 12: Sales to Public Authorities are typically sold under a special contract or tariff (e.g., fire department or other governmental entity.)

Line 13: If there are water sales for categories other than the ones listed in Lines 7-12 above, provide the thousands of gallons of water sold for "Other Sales" and an explanation that details the water sale. If an explanation is not given, the form will not calculate Line 14, and instead, will give an error message. The majority of the water sales should fall into the categories in Lines 7-12, such that most utilities will enter "0" into the "Other Sales" line.

Line 14: The sum of Lines 7-13 should match the amount of "Total Water Sales" in this row. This row will automatically calculate if the preceding lines are correctly filled out.

##### Other Water Used

Lines 17-21: These categories include water that is properly used but not sold and, therefore, does not generate revenue for the utility. All gallons of water that are reported in these categories should be supported by records to be kept at the utility's office, which will be subject to examination by the Division of Inspections.

Line 17: Provide the thousands of gallons of water used solely for the purpose of the utility and/or water treatment use. This would include, for example, backwashing the filtration system of the water treatment plant.

Line 18: Provide the thousands of gallons of water used for wastewater use. This would include, but would not be limited to, for example, water used to wash down/clean the wastewater plant.

Line 19: Provide the thousands of gallons of water used for system flushing, which is typically water used to keep water fresh and chlorine residuals up, and water used to flush lines to protect from Total Trihalomethanes (known as TTHM) and Haloacetic acids (known as HAA).

Line 20: Provide the thousands of gallons of water used by the Fire Department that are not provided in "Sales to Public Authorities" in Line 12. Only enter gallons for "Fire Department" use if the water is provided at no cost pursuant to the utility's tariff. All sales to fire departments should be entered in the sales category above. Pursuant to the requirements of KRS 278.170(3) and 807 KAR 5:095, Section 9(1), a utility that permits a fire department to use water at no charge or at reduced rates shall require the fire department to submit quarterly reports demonstrating its water usage. 807 KAR 5:095, Section 9(2), further requires a utility to include a penalty in its tariff for any fire department's failure to submit the required reports.

Line 21: Any water provided without charge as authorized by the utility's tariff or used by the utility to conduct the daily operation and maintenance of its treatment, transmission, and distribution systems that is not listed in Lines 17-20 above should be reported and explained as "Other Usage" on this line. If an explanation is not given, the form will not calculate Line 22, and instead, will give an error message. The majority of legitimate usage should fall into the categories on Lines 17-20, such that most utilities will enter "0" into the "Other Usage" line.

Line 22: The sum of Lines 17-21 should match the amount of "Total Other Water Used" in this row. This row will automatically calculate if the preceding lines are correctly filled out.

### Water Loss

Lines 25-30: All gallons of water reported for these lines represent all other water that is not billed or used in the production and transmission of water to customers. Any amounts included in these lines are part of the calculation of the Water Loss Percentage below. The utility should be prepared to support any amounts that appear in Lines 25-29 with records kept at the utility's office, which will be subject to examination by the Division of Inspections.

Line 28: Water reported in this category only includes water lost for excavation damages for which the water was neither billed, nor collected from the customer. If the amounts for excavation damages are recovered from the customer, these amounts should be reported in water sales.

Line 29: Water reported in this category only includes water lost for theft that was neither billed, nor collected from the customer. The water loss can be estimated by using the average monthly use for each class of customers. If amounts for water theft are recovered from the customer, these amounts should be reported in water sales.

Line 30: If there is water loss for categories other than those listed in Lines 25-29 above, provide the thousands of gallons of water loss for "Other Loss" and an explanation that details the specific water loss. If an explanation is not given, the form will not calculate Line 22, and instead, will give an error message. This would include, but not be limited to, malfunctioning meters, unknown loss, etc. The majority of the water loss should fall into the categories in Lines 25-29, such that most utilities will enter "0" into the "Other Loss" line.

Line 31: The sum of Lines 25-30 should match the amount of "Total Water Loss" in this row. This row will automatically calculate if the preceding lines are correctly filled out.

#### Water Loss Percentage

Line 36: The "Water Loss Percentage" in Line 36 will automatically calculate if all other lines on the form are filled out correctly. If the sum of Lines 14, 22, and 31 do not equal Line 4, the form will return an error in red that the Lines do not equal.

\*Estill County Water District #1  
Estill County Water District #1  
76 Cedar Grove Road  
Irvine, KY 40336

\*Big Sandy Water District  
Big Sandy Water District  
18200 Kentucky Route #3  
Catlettsburg, KY 41129

\*Breathitt County Water District  
Breathitt County Water District  
1137 Main Street, Suite 305  
Jackson, KY 41339

\*Allen County Water District  
Allen County Water District  
330 New Gallatin Road  
P. O. Box 58  
Scottsville, KY 42164

\*Beech Grove Water System, Inc.  
Beech Grove Water System, Inc.  
445 State Route 56 North  
Calhoun, KY 42327

\*Judy Water Association, Inc.  
Judy Water Association, Inc.  
2010 Maysville Road  
P. O. Box 781  
Mt. Sterling, KY 40353-0781

\*East Daviess County Water Associatio  
East Daviess County Water Association, Inc.  
9210 Highway Route 144  
Knottsville, KY 42366

\*Center Ridge Water District No. 2  
Center Ridge Water District No. 2  
1980 Buffalo Road  
New Concord, KY 42076

\*Murray #2 Water District  
Murray #2 Water District  
201 New Providence Road  
Murray, KY 42071

\*East Casey County Water District  
East Casey County Water District  
690 S Wallace Wilkinson Blvd  
P. O. Box 56  
Liberty, KY 42539

\*Black Mountain Utility District  
Black Mountain Utility District  
609 Four Mile Road  
Baxter, KY 40806-8437

\*Bronston Water Association, Inc.  
Bronston Water Association, Inc.  
2013 Highway 90  
P. O. Box 243  
Bronston, KY 42518

\*Bullock Pen Water District  
Bullock Pen Water District  
One Farrell Drive  
P. O. Box 188  
Crittenden, KY 41030

\*Barkley Lake Water District  
Barkley Lake Water District  
1420 Canton Road  
P. O. Box 308  
Cadiz, KY 42211

\*Buffalo Trail Water Association, Inc  
Buffalo Trail Water Association, Inc.  
41135 Highway 62  
Mayslick, KY 41055

\*McKinney Water District  
McKinney Water District  
2900 KY HWY 198  
Stanford, KY 40484

\*North Marshall Water District  
North Marshall Water District  
96 Carroll Road  
Benton, KY 42025

\*Cumberland County Water District  
Cumberland County Water District  
133 Lower River Street  
Burkesville, KY 42717-9622

\*Bath County Water District  
Bath County Water District  
21 Church Street  
P. O. Box 369  
Salt Lick, KY 40371

\*Boone County Water District  
Boone County Water District  
2475 Burlington Pike  
P. O. Box 18  
Burlington, KY 41005

\*Cumberland Falls Highway Water Distr  
Cumberland Falls Highway Water District  
6926 Cumberland Falls Highway  
Corbin, KY 40701-8637

\*Francis Water Company, Inc.  
Francis Water Company, Inc.  
29 Water Street  
Garrett, KY 41630

\*Wood Creek Water District  
Wood Creek Water District  
1670 Hal Rogers Parkway  
P. O. Box 726  
London, KY 40743

\*Farmdale Water District  
Farmdale Water District  
100 Highwood Drive, Route 8  
Frankfort, KY 40601

\*Corinth Water District  
Corinth Water District  
215 Thomas Lane  
P. O. Box 218  
Corinth, KY 41010

\*West Laurel Water Association, Inc.  
West Laurel Water Association, Inc.  
1670 Hal Rogers Parkway  
P. O. Box 726  
London, KY 40741

\*Fountain Run Water District #1  
Fountain Run Water District #1  
226 Main Street  
P.O. Box 118  
Fountain Run, KY 42133

\*Cunningham Water District  
Cunningham Water District  
7506 US Highway 52  
P. O. Box 644  
Cunningham, KY 42035

\*Muhlenberg County Water District  
Muhlenberg County Water District  
301 Dean Road  
P. O. Box 348  
Greenville, KY 42345

\*Gary Larimore  
Education Services Director  
Kentucky Rural Water Association  
Post Office Box 1424  
1151 Old Porter Pike  
Bowling Green, KENTUCKY 42102-1424

\*Bracken County Water District  
Bracken County Water District  
1324 Brooksville Germantown Road  
P. O. Box 201  
Brooksville, KY 41004

\*South Anderson Water District  
South Anderson Water District  
142 South Main Street  
P. O. Box 17  
Lawrenceburg, KY 40342

\*Gallatin County Water District  
Gallatin County Water District  
4500 Highway 455  
Sparta, KY 41086

\*Dexter-Almo Heights Water District  
Dexter-Almo Heights Water District  
351 Almo Road  
Almo, KY 42020

\*Kentucky-American Water Company  
Kentucky-American Water Company  
2300 Richmond Road  
Lexington, KY 40502

\*Garrison-Quincy-Ky-O-Heights Water D  
Garrison-Quincy-Ky-O-Heights Water District  
279 Robins Lane  
P. O. Box 279  
Garrison, KY 41141

\*Southern Water & Sewer District  
Southern Water & Sewer District  
245 Kentucky Route 680  
P. O. Box 610  
McDowell, KY 41647

\*Elkhorn Water District  
Elkhorn Water District  
7165 US 127 North  
P. O. Box 67  
Frankfort, KY 40602

\*Sharpsburg Water District  
Sharpsburg Water District  
16 East Mill Street  
P. O. Box 248  
Sharpsburg, KY 40374

\*East Laurel Water District  
East Laurel Water District  
1670 Hal Rogers Parkway  
P. O. Box 726  
London, KY 40743

\*Eastern Rockcastle Water Association  
Eastern Rockcastle Water Association, Inc.  
9246 Main Street  
Livingston, KY 40445

\*Milburn Water District  
Milburn Water District  
7731 State Route 80 East  
Arlington, KY 42021

\*Cawood Water District  
Cawood Water District  
54 Plant Road  
P. O. Box 429  
Cawood, KY 40815

\*Madison County Utilities District  
Madison County Utilities District  
297 Michelle Drive  
P. O. Box 670  
Richmond, KY 40476-0670

\*Butler County Water System, Inc.  
Butler County Water System, Inc.  
1118 S Main Street, Suite 1  
Morgantown, KY 42261

\*Martin County Water District  
Martin County Water District  
387 East Main Street, Suite 140  
Inez, KY 41224

\*Christian County Water District  
Christian County Water District  
1940 Dawson Springs Road  
P. O. Box 7  
Hopkinsville, KY 42241-0007

\*Simpson County Water District  
Simpson County Water District  
523 US Highway 31W Bypass  
P. O. Box 10180  
Bowling Green, KY 42102

\*Green River Valley Water District  
Green River Valley Water District  
1180 E Main Street  
P. O. Box 460  
Horse Cave, KY 42749

\*Jackson County Water Association, In  
Jackson County Water Association, Inc.  
U. S. Highway 421 South  
P. O. Box 232  
Tyner, KY 40486

\*Warren County Water District  
Warren County Water District  
523 US Highway 31W Bypass  
P. O. Box 10180  
Bowling Green, KY 42102-4780

\*Green-Taylor Water District  
Green-Taylor Water District  
250 Industrial Park Road  
P. O. Box 168  
Greensburg, KY 42743

\*Jessamine-South Elkhorn Water Distri  
Jessamine-South Elkhorn Water District  
802 S Main Street  
P. O. Box 731  
Nicholasville, KY 40356

\*Jonathan Creek Water District  
Jonathan Creek Water District  
7564 U. S. Highway 68E  
P. O. Box 414  
Benton, KY 42025

\*West Carroll Water District  
West Carroll Water District  
900 Clay Street  
P. O. Box 45  
Carrollton, KY 41008

\*Symsonia Water District  
Symsonia Water District  
11105 State Rt. 131  
P. O. Box 99  
Symsonia, KY 42082-9801

\*Pendleton County Water District  
Pendleton County Water District  
331 Highway 330 W  
P. O. Box 232  
Falmouth, KY 41040

\*Hyden-Leslie County Water District  
Hyden-Leslie County Water District  
356 Wendover Road  
Hyden, KY 41749

\*Caldwell County Water District  
Caldwell County Water District  
118 West Market Street  
Princeton, KY 42445

\*Justin M. McNeil  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Kirksville Water Association, Inc.  
Kirksville Water Association, Inc.  
297 Michelle Drive  
P. O. Box 670  
Richmond, KY 40476-0670

\*Graves County Water District  
Graves County Water District  
P. O. Box 329  
301 East Broadway  
Mayfield, KY 42066

\*Jessamine County Water District #1  
Jessamine County Water District #1  
2225 Lexington Road  
Nicholasville, KY 40356-9702

\*Grayson County Water District  
Grayson County Water District  
21 Shull White Road  
P. O. Box 217  
Leitchfield, KY 42754

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Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Lyon County Water District  
Lyon County Water District  
5464 U. S. Highway 62 West  
P. O. Box 489  
Kuttawa, KY 42055

\*Fleming County Water Association, In  
Fleming County Water Association, Inc.  
2772 Morehead Road  
P. O. Box 327  
Flemingsburg, KY 41041

\*Larue County Water District #1  
Larue County Water District #1  
6215 L & N Turnpike  
Buffalo, KY 42716

\*Edmonson County Water District  
Edmonson County Water District  
1128 Highway 259N  
P. O. Box 208  
Brownsville, KY 42210

\*Kent Chandler  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Ledbetter Water District  
Ledbetter Water District  
1483 US Highway 60W  
P. O. Box 123  
Ledbetter, KY 42058-0123

\*Northern Kentucky Water District  
Northern Kentucky Water District  
2835 Crescent Springs Road  
P. O. Box 18640  
Erlanger, KY 41018-0640

\*Henry County Water District #2  
Henry County Water District #2  
8955 Main Street  
P. O. Box 219  
Campbellsburg, KY 40011

\*Levee Road Water Association, Inc.  
Levee Road Water Association, Inc.  
4969 Levee Road  
P. O. Box 770  
Mt. Sterling, KY 40353

\*Harrison County Water Association, I  
Harrison County Water Association, Inc.  
2167 US 27 South  
Cynthiana, KY 41031

\*Knox County Utility Commission  
Knox County Utility Commission  
1905 Highway 930  
Barbourville, KY 40906

\*East Logan Water District, Inc.  
East Logan Water District, Inc.  
333 S Franklin Street  
Russellville, KY 42276

\*Letcher County Water and Sewer Distr  
Letcher County Water and Sewer District  
3443 US 119 North  
Mayking, KY 41837

\*Knott County Water & Sewer District  
Knott County Water & Sewer District  
7777 Big Branch Road  
Vicco, KY 41773

\*West Shelby Water District  
West Shelby Water District  
7101 Shelbyville Road  
P. O. Box 39  
Simpsonville, KY 40067

\*Meade County Water District  
Meade County Water District  
1003 Armory Place  
P. O. Box 367  
Brandenburg, KY 40108

\*Lindsey Ingram  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Lake Village Water Association, Inc.  
Lake Village Water Association, Inc.  
801 Pleasant Hill Drive  
P. O. Box 303  
Burgin, KY 40310

\*McCreary County Water District  
McCreary County Water District  
Highway 27  
P. O. Box 488  
Whitley City, KY 42653

\*Magoffin County Water District  
Magoffin County Water District  
749 Parkway Road  
P. O. Box 490  
Salyersville, KY 41465

\*Muhlenberg County Water District #3  
Muhlenberg County Water District #3  
4789 Main Street  
P. O. Box 67  
Bremen, KY 42325

\*North Hopkins Water District  
North Hopkins Water District  
316 Liberty Church Loop  
Madisonville, KY 42431

\*Montgomery County Water District #1  
Montgomery County Water District #1  
4412 Camargo Road  
Mt. Sterling, KY 40353

\*South Woodford Water District  
South Woodford Water District  
117-D Crossfield Drive  
Versailles, KY 40383

\*North Logan Water District #1  
North Logan Water District #1  
3118 Lewisburg Road  
Russellville, KY 42276

\*Marion County Water District  
Marion County Water District  
1835 Campbellsville Road  
P. O. Box 528  
Lebanon, KY 40033

\*Nicholas County Water District  
Nicholas County Water District  
1639 Old Paris Road  
Carlisle, KY 40311

\*North Nelson Water District  
North Nelson Water District  
5555 Louisville Road  
P. O. Box 25  
Cox's Creek, KY 40013

\*Monroe County Water District  
Monroe County Water District  
205 Capp Harlan Road  
Tompkinsville, KY 42167

\*Trimble County Water District #1  
Trimble County Water District #1  
P. O. Box 63  
34 E Morgan Drive  
Bedford, KY 40006-0063

\*North Shelby Water Company  
North Shelby Water Company  
4596 Bagdad Road  
P. O. Box 97  
Bagdad, KY 40003

\*North Mercer Water District  
North Mercer Water District  
4795 Louisville Road  
P. O. Box 79  
Salvisa, KY 40372

\*North McLean County Water District  
North McLean County Water District  
217 Hill Street  
P. O. Box 68  
Livermore, KY 42352

\*Nebo Water District  
Nebo Water District  
45 North Bernard Street  
Nebo, KY 42441

\*Monica Braun  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*North Manchester Water Association,  
North Manchester Water Association, Inc.  
7362 N Highway 421  
Manchester, KY 40962

\*Carroll County Water District #1  
Carroll County Water District #1  
205 Main Cross Street  
P. O. Box 350  
Ghent, KY 41045

\*Morgan County Water District  
Morgan County Water District  
1009 Hwy 172  
West Liberty, KY 41472

\*Northeast Woodford County Water Dist  
Northeast Woodford County Water District  
225A South Main Street  
Versailles, KY 40383

\*Powell's Valley Water District  
Powell's Valley Water District  
31 Adams Ridge Road  
P. O. Box 550  
Clay City, KY 40312

\*Henderson County Water District  
Henderson County Water District  
655 South Main Street  
P. O. Box 655  
Henderson, KY 42419-0655

\*Oldham County Water District  
Oldham County Water District  
2160 Spencer Court  
La Grange, KY 40031

\*Sandy Hook Water District  
Sandy Hook Water District  
1000 Howard's Creek Road  
P. O. Box 726  
Sandy Hook, KY 41171

\*Western Rockcastle Water Association  
Western Rockcastle Water Association, Inc.  
371 New Brodhead Road  
P. O. Box 627  
Mt. Vernon, KY 40456

\*Rattlesnake Ridge Water District  
Rattlesnake Ridge Water District  
3563 State Highway 1661  
P. O. Box 475  
Grayson, KY 41143-0475

\*Crittenden-Livingston County Water D  
Crittenden-Livingston County Water District  
620 East Main Street  
P. O. Box 495  
Salem, KY 42078

\*U. S. 60 Water District of Shelby an  
U. S. 60 Water District of Shelby and Franklin  
4596 Bagdad Road  
P. O. Box 97  
Bagdad, KY 40003

\*Mountain Water District  
Mountain Water District  
6332 Zebulon Highway  
P. O. Box 3157  
Pikeville, KY 41502-3157

\*South Logan Water Association, Inc.  
South Logan Water Association, Inc.  
114 S Main Street  
Adairville, KY 42202

\*Peaks Mill Water District  
Peaks Mill Water District  
7165 US 127 North  
Frankfort, KY 40601

\*Reid Village Water District  
Reid Village Water District  
903 Winchester Road  
P. O. Box 610  
Mt. Sterling, KY 40353

\*Southern Madison Water District  
Southern Madison Water District  
207 North Dogwood Drive  
P. O. Box 220  
Berea, KY 40403

\*Parksville Water District  
Parksville Water District  
10711 Lebanon Road  
P. O. Box 9  
Parksville, KY 40464

\*Fern Lake Company  
Fern Lake Company  
34 Appolo Fuels Road  
Middlesboro, KY 40965

\*South 641 Water District  
South 641 Water District  
207 Main Street  
P. O. Box 126  
Hazel, KY 42047

\*Rebecca W Goodman  
Assistant Attorney General  
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700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*South Eastern Water Association, Inc  
South Eastern Water Association, Inc.  
147 East Somerset Church Road  
Somerset, KY 42503

\*South Hopkins Water District  
South Hopkins Water District  
129 South Main Street  
P. O. Box 487  
Dawson Springs, KY 42408

\*Rowan Water, Inc.  
Rowan Water, Inc.  
1765 Christy Creek Road  
Morehead, KY 40351

\*Hardin County Water District #1  
Hardin County Water District #1  
1400 Rogersville Road  
Radcliff, KY 40159-0489

\*Water Service Corporation of Kentuck  
Water Service Corporation of Kentucky  
c/o Water Service Corp  
500 West Monroe Street, Suite 3600  
Chicago, IL 60661-3779

\*Garrard County Water Association, In  
Garrard County Water Association, Inc.  
315 Lexington Road  
P. O. Box 670  
Lancaster, KY 40444

\*Laurel County Water District #2  
Laurel County Water District #2  
3910 South Laurel Road  
London, KY 40744

\*Southeast Daviess County Water Distr  
Southeast Daviess County Water District  
3400 Bittel Road  
Owensboro, KY 42301

\*Hardin County Water District #2  
Hardin County Water District #2  
360 Ring Road  
P. O. Box 970  
Elizabethtown, KY 42702-0970

\*East Pendleton Water District  
East Pendleton Water District  
601 Woodson Road  
Falmouth, KY 41040

\*Whitley County Water District #1  
Whitley County Water District #1  
19 S Highway 25W  
Williamsburg, KY 40769

\*Todd County Water District  
Todd County Water District  
2201 New Highway 68 West  
P. O. Box 520  
Elkton, KY 42220

\*Webster County Water District  
Webster County Water District  
478 US HWY 41-A South  
P. O. Box 320  
Dixon, KY 42409-0320

\*Western Lewis-Rectorville Water and  
Western Lewis-Rectorville Water and Gas District  
8044 KY 3161  
Maysville, KY 41056-9344

\*Cannonsburg Water District  
Cannonsburg Water District  
1606 Cannonsburg Road  
Ashland, KY 41102

\*East Clark County Water District  
East Clark County Water District  
118 Hopkins Lane  
P. O. Box 112  
Winchester, KY 40391

\*Western Mason County Water District  
Western Mason County Water District  
2573 Mary Ingles Highway  
P. O. Box 49  
Dover, KY 41034-0049

\*Union County Water District  
Union County Water District  
409 North Court Street  
P. O. Box 146  
Morganfield, KY 42437

\*West McCracken County Water District  
West McCracken County Water District  
8020 Ogden Landing Road  
West Paducah, KY 42086

\*Western Pulaski County Water Distric  
Western Pulaski County Water District  
2128 West Highway 80  
Somerset, KY 42503

\*Adair County Water District  
Adair County Water District  
109 Grant Lane  
P. O. Box 567  
Columbia, KY 42728

\*Western Fleming County Water Distric  
Western Fleming County Water District  
1500 Ewing Road  
P. O. Box 16  
Ewing, KY 41039

\*Ohio County Water District  
Ohio County Water District  
124 E Washington Street  
P. O. Box 207  
Hartford, KY 42347

\*West Daviess County Water District  
West Daviess County Water District  
3400 Bittel Road  
Owensboro, KY 42301