

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF GRAYSON)	
COUNTY WATER DISTRICT FOR A DEVIATION)	CASE NO.
FROM METER TESTING REQUIREMENTS OF 807)	2019-00115
KAR 5:066, SECTION 16(1))	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO GRAYSON COUNTY WATER DISTRICT

Grayson County Water District (Grayson District), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on August 1, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

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.

Grayson District 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 Grayson District fails or refuses to furnish all or part of the requested information, Grayson District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Grayson District 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, paragraph 12, which states: "After the first group of meters reaches 15 years of age, GCWD will evaluate the data and request that the Commission: (1) extend the sample meter testing plan; (2) allow GCWD to replace meters on a 15-year cycle; or (3) approve another appropriate course of action." If the Commission were to find that the record supported extending the periodic testing cycle without conducting sample testing, state whether and why it would be necessary for the Commission to review and issue an order regarding the reliability of Grayson District's sample testing methodology.

2. Refer to the application, paragraph 13(d) and Exhibit 1, sample testing plan, in which it states that Badger, the meter manufacturer, represents that Grayson District's meters will remain accurate for 15 years.

a. Provide all manufacturer materials, correspondence, opinions, and other documents received by Grayson District regarding the number of years its 5/8- x 3/4-inch Badger meters will remain accurate.

b. Provide all warranties for Grayson District's 5/8- x 3/4-inch Badger meters.

c. Explain whether and, if so, why a previous finding that 5/8- x 3/4-inch water meters are accurate for 15 years supports a finding that Grayson District's 5/8- x 3/4-inch Badger meters will remain accurate for that period.

d. Provide any other information Grayson District contends support its contention that its 5/8- x 3/4-inch Badger meters will remain accurate for 15 years.

3. Refer to the application, paragraph No. 13(b) and Exhibit 1, Appendix B.

a. Provide a detailed explanation of how the cost of the meters used in the estimate was determined, and provide evidentiary support for this amount.

b. Describe what is meant by the "cost to change out" the meter and how Grayson District estimated it would be \$25.28 per meter.

c. Briefly explain why the "cost of sample testing" is identical to the "cost to change out" the meter.

4. Refer to the application, paragraph No. 13(d), which states: "Under the Plan and GCWD's current request, the meters will not remain in service longer than 15 years without further Commission approval."

a. Provide a breakdown by year of when all 5/8- x 3/4-inch Badger meters in Grayson District's system were first placed in service, e.g., the number that was first placed in service in 2005, 2006, etc.

b. Confirm that under the proposed plan Grayson District will remove all 5/8- x 3/4-inch Badger meters from service on or before they reach 15 years in service.

5. Identify who prepared Grayson District's sample testing plan.

6. State whether Grayson District received any opinions from an engineer, statistician, or another person with relevant scientific or technical knowledge of sample testing practices regarding whether Grayson District's sample testing plan will reliably reflect the accuracy of its 5/8- x 3/4-inch Badger meters as a whole. If so, provide the following information:

a. The name of each person who rendered such an opinion;

b. The education, experience, and qualifications of each such person;

c. The opinion of each such person regarding whether Grayson District's sample testing plan will reliably reflect the accuracy of its 5/8- x 3/4-inch Badger meters as a whole; and

d. The bases for each such person's opinion.

7. Refer to Grayson District's sample testing plan in which it indicates that it will use an AQL of 10.0 for minimum flow rates.

a. Explain how the use of an AQL of 10.0 is consistent with the requirements of the ANSI Standard, with reference to the relevant sections of the ANSI Standard.

b. Explain the basis for Grayson District's contention that an AQL of 10.0 for minimum flow rates is appropriate, other than the fact that it was used in another case.

c. Explain the basis for Grayson District's contention that an AQL of 10.0 for minimum flow rates would provide reliable results.

8. Refer to the application, Exhibit 1, and the sample testing plan, which indicates that Grayson District will use an AQL of 2.5 for maximum and intermediate flow rates.

a. Explain how the use of an AQL of 2.5 is consistent with the requirements of the ANSI Standard, with reference to the relevant sections of the ANSI Standard.

b. Explain the basis for Grayson District's contention that an AQL of 2.5 for maximum and intermediate flow rates is appropriate, other than the fact that it was used in another case.

c. Explain the basis for Grayson District's contention that an AQL of 2.5 for maximum and intermediate flow rates would provide reliable results.

9. a. Confirm that using an AQL of 10.0 for minimum flow rates and an AQL of 2.5 for maximum and intermediate flow rates requires Grayson District to test significantly fewer meters at the minimum flow rate.

b. State whether Grayson District would incur any additional cost if it conducted a minimum flow rate test on every meter on which it conducted the maximum and intermediate flow rate tests and if so, quantify the additional cost.

c. Confirm that the results of Grayson District's sample testing plan would be more accurate if it conducted the minimum flow rate test on every meter on which it conducted the intermediate and maximum flow rate tests but did not change another aspect of its sample testing plan, and if Grayson District cannot confirm, please explain.

d. Explain each basis for not conducting a minimum flow rate test on all meters Grayson District pulls for maximum and intermediate flow rate testing as opposed to only a portion of the meters Grayson District pulls for maximum and intermediate flow rate testing.

10. Explain whether the ANSI Standard anticipates increasing the level of scrutiny for subsequent lots if previous lots performed poorly, and, if so, explain why Grayson District's sample testing plan does not require similar increased scrutiny.

11. Explain in detail how meters for each lot will be randomly selected.

12. Provide a breakdown of the 5/8- x 3/4-inch Badger meters in Grayson District by model, and briefly explain any differences among the models.

13. Provide the minutes of the meetings of Grayson District's Board of Commissioners in which the current request for deviation was discussed and authorized.


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DATED JUL 15 2019

cc: Parties of Record

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