

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC GRAVES COUNTY WATER)	
DISTRICT'S UNACCOUNTED-FOR WATER LOSS)	CASE NO.
REDUCTION PLAN, SURCHARGE, AND)	2019-00347
MONITORING)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO GRAVES COUNTY WATER DISTRICT

Graves County Water District (Graves District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on April 22, 2022. The Commission directs Graves District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Graves District shall make a timely amendment to any prior response if Graves District obtains the information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Graves District fails or refuses to furnish all or part of the requested information, Graves 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, Graves 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. Provide the amount Graves District will receive in federal funding for the damaged DMAs and any other water loss equipment, including the date Graves District expects to receive the funds.
2. Provide justification for why the one uninstalled DMA was not included in the average cost for the meters.
3. Provide a specific plan for reaching the goal of installation of the DMAs.
4. Provide any contracts for the purchase of the DMAs.

5. For the DMAs installed in this reporting period, provide the following:
 - a. The dates the DMAs were ordered;
 - b. The dates the DMAs were received.
 - c. The dates that Graves District paid for the DMAs; and
 - d. The dates the DMAs were installed by the District.
6. Provide the estimated amount of time Graves District anticipates leasing the hydro-excavator truck and the estimated total cost of the lease.
7. Refer to Table 3 on page 10 of the Annual Progress Report.
 - a. Provide an explanation for the marked increase in unaccounted-for water loss in the Hickory and South Graves's former districts.
 - b. Provide an explanation for the marked decrease in unaccounted-for water loss in the Fancy Farm and Sedalia former districts.
 - c. Provide an explanation for the decrease in unaccounted-for water loss for the Consumer's former district.
 - d. Provide an explanation for the lack of change in unaccounted-for water loss in the Hardeman former district.
8. Explain and justify how Graves District determines how to allocate its water-loss prevention efforts across its system.
9. Refer to the Annual Progress Report, generally.
 - a. Explain why Graves District chose to not purchase the noise logger devices.
 - b. Provide any agreements with MEWS, related to the borrowing of the noise logger devices.

- c. How often has Graves District borrowed the device(s)?
- d. Provide any record(s) of time spent using the device and leaks

located based on using the device(s).

10. Refer to Annual Report, page 8. The following statement was made: “Graves District intends to continue to focus its leak detection on the South Graves Water District and Consumers Water District areas, which are currently experiencing the highest water loss rates.” Justify this statement with any supporting documentation, considering that Hardeman District’s water loss rate is the highest of any at 45 percent.

Linda C. Bridwell, PE
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Public Service Commission
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DATED APR 01 2022

cc: Parties of Record

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