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 SECOND 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 30, 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 filling 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 "Attachment to Question 2(b)" produced in response to Commission Staff's First Request for Information (Staff's First Request), Item 2(b).
- a. Provide the AWWA New Meter Accuracy standards to which Grayson District's meters are warranted for five years from the date of shipment or the registration of 750,000 gallons, whichever comes first.
- b. Provide the AWWA Repaired Meter Accuracy standards to which Grayson District's meters are warranted for fifteen years from the date of shipment or the registration of 2,500,000 gallons, whichever comes first.

- 2. Refer to Grayson District's response to Staff's First Request, Item 2(d), in which Grayson District provided the test results for "all of the 2005 meters that were removed from service and tested in 2018."
- a. Confirm that the test results provided in response to Staff's First Request, Item 2(d), include all 5/8- x 3/4-inch Badger meters installed in 2005 that remained in service through 2018, and if Grayson District is unable to confirm, explain why.
- b. Identify the number of 5/8- x 3/4-inch Badger meters installed in 2005 that were taken out of service before 2018.
- c. Briefly explain how the meter tests for which the results were reported in response to Staff's First Request, Item 2(d), were conducted.
- d. If the Commission were to approve Grayson District's deviation requested in the application, state whether Grayson District would continue to test all meters when they are taken out of service, and if so, would Grayson District also conduct sample testing of those meters in their fifteenth year of service.
- 3. Refer to Table A-1 in Grayson District's Sample Meter Testing Plan attached to the application. Provide the definition for "AOL" as used in the phrase "[f]or specified AOL values falling within these ranges."
- 4. Refer to the definition of AQL in the American National Standard Institute ANSI/ASQ Z1.9-2003 (R2013) (hereinafter the ANSI Standard) at section A2 and A4. Explain whether AQL, as used in the ANSI Standard, represents the percent of the lot that may permissibly not meet the specification being tested or the extent to which samples tested may fall outside the specification limit(s) without failing.

- 5. Refer to Grayson District's Sample Meter Testing Plan attached to the application.
- a. Confirm that Grayson District's Sample Meter Testing Plan proposes to use the procedures of Section B, Part 1, to test the meters at low flow, and if Grayson District is unable to confirm, explain why.
- b. Confirm that Grayson District's Sample Meter Testing Plan proposes to use the procedures of Section B, Part 2, to test the meters at high and medium flow, and if Grayson District is unable to confirm, explain why.
- c. Identify those portions of the procedures of Section B, Part 1, that Grayson District will not follow, if any, when sample testing meters at low flow.
- d. Identify those portions of the procedures of Section B, Part 2, that Grayson District will not follow, if any, when sample testing meters at high and medium flow.
- 6. Identify the speciation limit that Grayson District will test when testing its meters at low flow.
- 7. Refer to the ANSI Standard at A4.3 in which it states that "[i]n the case of a double specification limit, either an AQL value is specified for the total percent nonconforming outside of both upper and lower specification limits, or two AQL values are specified, one for the upper limit and another for the lower limit."
- a. Confirm that Grayson District intends to use a single AQL value for the total percent nonconforming when testing meters at high and medium flow.

b. Confirm that the ANSI Standard would not indicate the extent to

which many of meters are registering over the upper limits set out in 807 KAR 5:066. If

a single AQL value is used to measure a double specification limit, and if Grayson District

is unable to confirm, explain why.

8. Refer to the ANSI Standard at A8 in which it indicates that the ANSI

Standard assumes that the underlying distribution of individual measurements to be

normal in shape and states that a person knowledgeable in statistics should be consulted

to advise whether the distribution appears suitable for sampling by variables. Explain

why Grayson District contends that the underlying distribution of individual measurements

of its meters is normal in shape.

9. Explain why Grayson District is proposing to use the variability unknown,

standard deviation method in Section B of the ANSI Standard as opposed to the variability

unknown, range method in Section C of the ANSI Standard.

10. Identify the number of complaints Grayson District has received in each of

the last five calendar years and so far this year regarding meters over- or underregistering

flow, and identify the number of those complaints in which Grayson District has

determined that the meters were over- or underregistering flow.

Gwen R. Pinson

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED ____AUG 1 3 2019

cc: Parties of Record

*Gerald E Wuetcher Attorney at Law STOLL KEENON OGDEN PLLC 300 West Vine Street Suite 2100 Lexington, KENTUCKY 40507-1801

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

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

*Mary Ellen Wimberly STOLL KEENON OGDEN PLLC 300 West Vine Street Suite 2100 Lexington, KENTUCKY 40507-1801