

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ELKHORN	)	
WATER DISTRICT FOR A CERTIFICATE OF	)	
PUBLIC CONVENIENCE AND NECESSITY TO	)	
REPLACE 6600 LF OF PIPELINE, TO	)	CASE NO.
REPLACE A BOOSTER PUMP STATION, TO	)	2020-00113
INSTALL A NEW MASTER METER, AND NEW	)	
INDIVIDUAL METERS, AND TO REFURBISH	)	
AN EXISTING ELEVATED WATER TANK	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO ELKHORN WATER DISTRICT

Elkhorn Water District (Elkhorn District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due within ten days of the date of entry of this request. Pursuant to the Commission's Orders in Case No. 2020-00085,<sup>1</sup> issued March 16, 2020, and March 24, 2020, Elkhorn District SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. 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.

---

<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

Elkhorn District shall make timely amendment to any prior response if it obtains 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 Elkhorn District fails or refuses to furnish all or part of the requested information, Elkhorn 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, Elkhorn 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 Elkhorn District's response to Staff's First Request for Information (Staff's First Request), Item 8.

a. Provide the winning bids requested therein for the improvements within the scope of Contract I and the improvements within the scope of Contract II as those contracts are defined in Addendum #1 to the contract documents filed as Exhibit 5 to the application.

b. Confirm that those bids were the lowest bids received for the work proposed, and if they were not the lowest bids, explain in detail why those bids were chosen over the lowest bids.

2. Refer to Elkhorn District's response to Staff's First Request, Item 10(d).

a. Confirm the potential alternatives to replacing the current meters with the meters and the meter reading system as proposed by Elkhorn District would be to replace Elkhorn District's current meters with new meters that would be read manually, replace the current meters with meters that would be read using advanced metering infrastructure (AMI), and replace the current meters with a different type of automated meter reading (AMR) meters. Explain why if this cannot be confirmed.

b. Explain why Elkhorn District chose AMR meters and the AMR system proposed over new meters that would be read manually and new meters that would be read using an AMI system.

c. Explain why Elkhorn District chose to require the use of the Sensus SR, positive displacement water meter, in the detailed specifications sent to bidders as opposed to requiring the use of other brands and types of meters.

3. Refer to Elkhorn District's response to Staff's First Request, Item 10(g).

a. Identify the number of hours spent, on average, each month reading meters.

b. Provide an itemized explanation of the expected costs savings each year arising from the reduction in time spent reading meters due to the installation of AMR meters.

c. State whether Elkhorn District anticipates eliminating any personnel or reducing the hours of existing personnel as a result of the switch from meters that are manually read to AMR meters.

4. Refer to Elkhorn District's response to Staff's First Request, Item 12.

a. Confirm that Frankfort Electric and Water Plant Board will be paying for the master meter described in the project, and explain why if Elkhorn District is not able to confirm.

b. Provide an itemized cost estimate of those portions of the project to install a new master meter for which Elkhorn District will be responsible.

c. Explain how Elkhorn District will fund its portion of the project to install a new master meter, and confirm that it is not funded with the proceeds of the loans for which authority is requested herein.

5. Refer to Elkhorn District's response to Staff First Request, Item 1(c) and Exhibit 5 of the application in this matter at Addendum #1 to the contract documents. Confirm that Elkhorn District is not requesting a Certificate of Public Convenience and Necessity or financing approval for the renovation of the elevated water storage tank that is the subject of Contract III.



---

Kent A. Chandler  
Acting Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED SEP 11, 2020

cc: Parties of Record

Case No. 2020-00113

\*Clayton B. Patrick  
Attorney  
Patrick Law Firm  
415 W. Main Street  
Suite 8  
Frankfort, KENTUCKY 40601

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

\*Michael Dudgeon  
Chairman  
Elkhorn Water District  
P. O. Box 67  
Frankfort, KY 40602