

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC BEECH GROVE WATER SYSTEM, )	
INC. UNACCOUNTED-FOR WATER LOSS )	CASE NO.
REDUCTION PLAN, SURCHARGE AND )	2022-00318
MONITORING )	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO BEECH GROVE WATER SYSTEM, INC.

Beech Grove Water System, Inc. (Beech Grove Water), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due on May 15, 2023. The Commission directs Beech Grove Water to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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.

Beech Grove Water shall make timely amendment to any prior response if Beech Grove Water obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Beech Grove Water fails or refuses to furnish all or part of the requested information, Beech Grove Water shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Beech Grove Water shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Monthly Water Loss Report for October 2022, filed on April 4, 2023. Explain the factors contributing to the reduction of Beech Grove Water's water loss percentage to 11.88 percent for October 2022, given that Beech Grove Water reported a 22.13 percent water loss for the year-ending December 31, 2021.

2. Refer to the Monthly Water Loss Report for January 2023, filed on April 6, 2023.

a. Confirm that the water loss percentage of 5.88 percent recorded for January 2023 is accurate.

b. If the accuracy of this figure cannot be confirmed, provide the water loss percentage for January 2023.

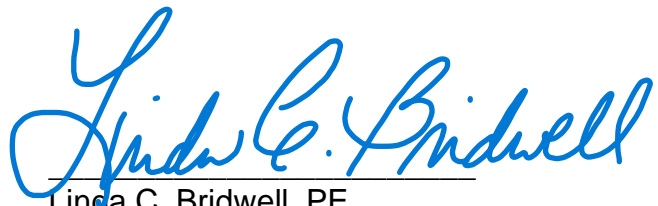
3. Refer to the Monthly Water Loss Report for February 2023, filed April 6, 2023.

a. State why this form indicates it is for January 2023.

b. Confirm that the water loss percentage of 0.10 percent is accurate for February 2023.

c. If the accuracy of this figure cannot be confirmed, provide the water loss percentage for February 2023.

d. If the accuracy of the figure is confirmed, explain how this percentage of water loss is possible.



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Executive Director  
Public Service Commission  
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DATED APR 19 2023

cc: Parties of Record

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