## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC MCKINNEY WATER DISTRICT	)	
UNACCOUNTED-FOR WATER LOSS	)	CASE NO.
REDUCTION PLAN, SURCHARGE AND	)	2023-00194
MONITORING	)	

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MCKINNEY WATER DISTRICT

McKinney Water District (McKinney District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on February 16, 2024. The Commission directs McKinney District 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

<sup>&</sup>lt;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.

McKinney District shall make timely amendment to any prior response if McKinney District 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 McKinney District fails or refuses to furnish all or part of the requested information, McKinney 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 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, McKinney 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 page 14 of the "Water Loss Investigation and Response" document filed in this proceeding on December 26, 2023. For the Meuller meters listed under Year One-2024 on the Capital Opinion of Cost Water Loss Surcharge:

a. State where in the system the meters will be placed and whether McKinney District currently uses this meter model in its system;

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b. State whether the meters will be installed by McKinney Distract employees or outside contractors;

c. State whether the \$57,500 cost includes the cost to install the meters; and

d. If the cost to install was not included in the cost estimate, provide an estimated cost to install the meters.

2. Refer to page 14 of the "Water Loss Investigation and Response" document filed in this proceeding on December 26, 2023. For the "pits for ultrasonic meter" listed under Year One-2024 on the Capital Opinion of Cost Water Loss Surcharge:

a. State whether the \$25,000 provided is an estimate of labor cost to install pits or whether it includes other items or labor;

b. State whether labor will be provided by McKinney District employees or outside contractors; and

c. State where the meter pits will be located in McKinney District's system.

3. Refer to page 14 of the "Water Loss Investigation and Response" document filed in this proceeding on December 26, 2023. For the meter maps listed under Year One-2024 on the Capital Opinion of Cost Water Loss Surcharge:

a. Provide an explanation for the \$3,500 cost estimate, including what labor or materials are included in the estimate;

b. State whether any labor will be provided by outside contractors or McKinney District employees.

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4. Refer to page 10 of the "Water Loss Investigation and Response" document filed in this proceeding on December 26, 2023. For the Phase 1B Water Improvement project:

a. State whether McKinney District anticipates applying to the Commission for a Certificate of Public Convenience and Necessity (CPCN) or financing approval for this project;

b. If so, state approximately when McKinney District anticipates filing its application; and

c. If no CPCN or financing application is anticipated, explain why not.

5. Refer to page 4 of the "Water Loss Investigation and Response" document filed in this proceeding on December 26, 2023. For the planned construction project to purchase water from the city of Danville, Kentucky:

a. Explain whether this construction project is the same project referred to as "Phase 1B" on page 10 of the "Water Loss Investigation and Response" document;

b. If this project is not the same project as Phase 1B, state whether
McKinney District anticipates applying to the Commission for a Certificate of Public
Convenience and Necessity (CPCN) or financing approval for this project;

c. If so, state approximately when McKinney District anticipates filing its application; and

d. If this project is not the same as Phase 1B and no CPCN or financing application is anticipated, explain why not.

6. Refer to page 13 and pages 17–19 of the "Water Loss Investigation and Response" document filed in this proceeding on December 26, 2023.

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a. State weather McKinney District intends to use surcharge funds for Phase 2 and Phase 3 of its Water System Improvement Project.

b. If McKinney District intends to use surcharge funds for Phase 2 or 3, describe the projects and associated costs.

7. Refer to pages 13 and 14 of the "Water Loss Investigation and Response" document filed in this proceeding on December 26, 2023. For any expenses that will not be paid for using water loss surcharge funds state the anticipated source and the amount of any known or anticipated funding.

Snidwell

Linda C. Bridwell, PE Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED \_\_\_\_\_ JAN 25 2024

cc: Parties of Record

\*Robert K. Miller Straightline Kentucky LLC 113 North Birchwood Ave. Louisville, KENTUCKY 40206

\*McKinney Water District 2900 KY HWY 198 Stanford, KY 40484

\*Matt Rankin Chairman McKinney Water District P. O. Box 7 McKinney, KY 40448