

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ALLEN COUNTY WATER)	CASE NO.
DISTRICT UNACCOUNTED-FOR WATER LOSS)	2023-00212
REDUCTION PLAN, SURCHARGE MONITORING)	

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

Allen County Water District (Allen 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 December 18, 2024. The Commission directs Allen 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.

Allen District shall make timely amendment to any prior response if Allen 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 Allen District fails or refuses to furnish all or part of the requested information, Allen 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, Allen 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 Allen District's proposed Qualified Infrastructure Improvement Plan (QIIP) and Motion for Authority to Expend Surcharge Proceeds.²

² Allen District's Verified Motion for Authority to Expend Surcharge Proceeds (filed Oct. 1, 2024).

a. Confirm that the reimbursement requested is for water meter replacement and installation of zone meters that occurred prior to the Commission's approval of the water loss surcharge on February 3, 2021 in Case No. 2020-00296.³

b. If so, explain why these meter replacements should be reimbursed from the water loss surcharge funds.

c. Explain whether there has been any on-going water meter replacements or installation of zone meters since the Commission's approval of the water loss surcharge in 2021.

d. If so, provide how many meters have been replaced, per year, since 2021.

2. Refer to the QIIP, where Allen District referenced that it wished to utilize surcharge funds for expenses already incurred for the 31-E emergency repairs, installation of zone meters, and replacement of water meters, and stated that it wished to use any remaining funds to expedite the replacement of retail meters. If Allen District is currently active in replacing or has a plan in place for further water meter replacements or installation of further zone meters, explain if it still contemplates the use of surcharge funds towards those projects.

a. If so, provide the number of meters to be replaced, the expected timeline of replacements, and any estimates Allen District has obtained for the cost of the meters and installation.

³ Case No. 2020-00296, *Electronic Application of Allen County Water District for an Alternative Rate Adjustment* (Ky. PSC Feb. 3, 2021).

b. Explain if Allen District has obtained any funding from Kentucky Infrastructure Authority, United States Department of Agriculture Rural Development, or any other source for its on-going or future water meter replacements.



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

DATED DEC 04 2024

cc: Parties of Record

*Allen County Water District
330 New Gallatin Road
Scottsville, KY 42164

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Scottsville, KY 42164