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**Public Protection and**  
**Regulation Cabinet**  
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**Executive Director**  
**Public Service Commission**

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**Vice Chairman**  
**Robert E. Spurlin**  
**Commissioner**

February 1, 2002

Dr. William H. Tudor  
1171 Old Town Branch Road  
Richmond, Kentucky 40475

Re: Installation of Fire Hydrants

Dear Dr. Tudor:

Receipt of your letter of November 26, 2001 concerning the installation of fire hydrants in certain subdivisions in Madison County, Kentucky is acknowledged. I apologize for the delay in responding.

In your letter, you present the following question: Do the Public Service Commission's regulations permit a water utility to install a hydrant for the purpose of refilling fire tanker trucks where only a four-inch water main serves the proposed hydrant?

Administrative Regulation 807 KAR 5:066, Section 10(2)(b) provides that a utility may install fire hydrants only if "a professional engineer with a Kentucky registration has certified that the system can provide a minimum fire flow of 250 gallons per minute" and "[t]he system supporting this flow has the capability of providing this flow for a period of not less than two (2) hours plus consumption at the maximum daily rate."

Commission Staff is of the opinion that a four-inch water main generally cannot provide the minimum flow that Administrative Regulation 807 KAR 5:066, Section 10(2)(b) requires and therefore should not serve a fire hydrant. Several leading authorities endorse this position. See, e.g., Great Lakes Upper Mississippi River Board of State Public Health and Environmental Managers, Recommended Standards for Water Works §8.1.2 (1997) ("The minimum size of water main for providing fire protection and serving fire hydrants shall be six-inch diameter.")

While Commission regulations prohibit the placement of a fire hydrant on a four-inch water main, they permit flushing or blowoff assemblies to be placed on four-inch water mains. If appropriate measures are taken to guard against cross-contamination

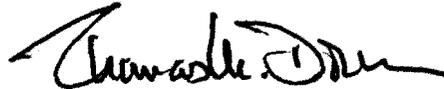


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and negative pressures, flushing or blowoff assemblies may be used for the limited purpose that you propose in your letter. Because such assemblies closely resemble fire hydrants, Commission Staff is of the opinion that the water utility and local fire departments should take reasonable measures to inform the public and the insurance community of the limitations of these assemblies. Without such measures, the public and the insurance community are likely to be lulled into a false sense of security by the presence of these assemblies.

This letter represents Commission Staff's interpretation of the law as applied to the facts presented. This opinion is advisory in nature and not binding on the Commission should the issues herein be formally presented for Commission resolution. Questions concerning this opinion should be directed to Gerald Wuetcher, Assistant General Counsel, at (502) 564-3940, Extension 259.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas M. Dorman". The signature is fluid and cursive, with a large initial "T" and "D".

Thomas M. Dorman  
Executive Director