The Sound Choice for Leak Detection.™

August 11, 2023

VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg PA 17120

Re: Proposed Water Audit Methodology Regulation 52 Pa. Code § 65.20a – Water Conservation Measures; Docket No. L-2020-3021932

Dear Secretary Chiavetta:

Fluid Conservation Systems and its sister companies have over 300,000 leak detection loggers installed globally on drinking water systems. Our headquarters are in Pennsylvania, where we have over 12,000 leak detection loggers installed.

As a stakeholder, we are submitting comments regarding leak detection costs. A leak detection logger that continuously monitors consists of 1) a sensor to listen for the leak, 2) a data logger to collect the sensor data, 3) a data plan with the cellular provider, and 4) a hosting plan to analyze and store the incoming data. This system is typically $240 per logger per year.

The pipe type determines the recommended spacing of the loggers, which are picking up the pipe vibrations caused by the leak. Hard materials, such as metallic, transmit vibration much farther than soft materials, such as plastic. The loggers are recommended to be placed 500 feet apart on metallic pipe that is 12 inches and smaller with pressures equal to or greater than 40 psi. Recommended spacing for transite pipe with pressures equal to or greater than 40 psi is 350 feet apart. For PVC pipe, all pipe below 40 psi and metallic pipe larger than 12 inches, we recommend 200 feet spacing. A small utility may have 10 to 150 loggers depending on how much pipe they want to monitor. A mid-sized utility may have 150-500 loggers, while large utilities can have thousands.

Please contact me if you have any questions.

Respectfully submitted,

Beth Pearsall Powell
President

1960 Old Gatesburg Road, Suite 150
State College, PA 16803
www.fluidconservation.com
1-800-531-5465