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JUL 10 2013

**PUBLIC SERVICE
COMMISSION**

July 3, 2013

Commonwealth of Kentucky
Public Service commission
211 Sower Blvd, PO Box 615
Frankfort, Kentucky 40602-0615

RE: Periodic Regulatory Compliance Sewer Utility Inspection
Report Number: ProMan PM-051013

As mentioned in the above referenced report, please accept this as our request to deviate from the newly changed regulation, requiring that all mechanical equipment be inspected on a daily basis.

We have been inspecting our equipment two to three times per week, which was in compliance with the earlier requirement that mechanical equipment be inspected on a weekly basis. However, since the requirement changed earlier this year, this is not deemed satisfactory. We have established a routine of inspection that has seemed to work well. Our concern is that this daily requirement will place a substantial burden that may be impractical to implement. We do not want to run the risk as looking as though we are not in compliance, therefore, we are asking for a variance.

We are requesting that we be permitted to keep the inspection schedule as it has been in the past. We are hoping that we will be granted permission to deviate from the current new regulatory requirement of daily inspections.

If you have further questions, please contact me.

Respectfully,



Brett Cade
200 Water Works Road, Ofc B
Fort Thomas, Kentucky 41075



Steven L. Beshear
Governor

Leonard K. Peters
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
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David L. Armstrong
Chairman

James W. Gardner
Vice Chairman

Linda Breathitt
Commissioner

Handwritten initials and date: 5/26/2013

May 24, 2013

Mr. Brett Cade
Pro Man Property Management, LLC
200 Water Works Road
Office B
Fort Thomas, KY 41075

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PUBLIC SERVICE
COMMISSION

PERIODIC REGULATORY COMPLIANCE SEWER UTILITY INSPECTION

On May 10, 2013, Commission Staff Member Brian Rice inspected the facilities and records of Pro Man Property Management, LLC. A copy of the report of this inspection is enclosed.

Based on Mr. Rice's findings, two deficiencies are noted as follows:

1. Bret Cade and Jeff Cox have not been instructed in accepted methods of artificial respiration (CPR) contrary to 807 KAR 5:006, Section 25(3).
2. No inspection records were produced of the utility's collecting sewers and manholes on a scheduled basis at intervals not to exceed one year contrary to 807 KAR 5:071, Section 7(4).

The previous inspection was conducted on June 23, 2011 and no deficiencies were noted then.

✓ Enclosed are two deficiency tracking reports. Please review and complete the three sections under the heading "Response" no later than July 10, 2013.

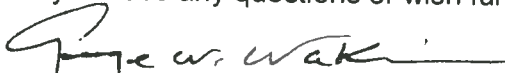
As noted in the inspection report, all mechanical equipment shall be inspected on daily basis according to 807 KAR 5:071, Section 7(4). The utility inspects all mechanical equipment two to three times a week, therefore, the utility has complied with 807 KAR 5:006, Section 25(8) which required the inspection of mechanical equipment to be done on weekly basis. However, this requirement has been removed from the PSC regulations on January 4, 2013. The new regulation, as stated above, requires the inspection of all mechanical equipment on daily basis. During this inspection, the utility has been made aware of this regulatory change by Mr. Rice who will verify compliance status during the next inspection visit.

As provided for in 807 KAR 5:071, Section 7(4), for good cause shown, the utility may request Commission authorization to deviate from the current regulatory requirement for daily inspection of mechanical equipment and the scheduled inspections of collecting sewers and manholes noted in deficiency No.2.

Concerning the potential trip and fall risks that appear to be present due to the configuration of the treatment plant, the utility is requested to address the minimization or removal of those risks in the most responsible and expedient fashion possible.

✓ In regards to the utility's Plant No. 2 that serves apartments located on the lower portion of Davjo Road, provide any prior correspondence or communication with the Commission seeking an opinion or approval whether the said plant should be regulated by the Commission. If no information is available, the utility is recommended to submit a written request for an opinion to the Commission by July 10, 2013.

If you have any questions or wish further assistance, please contact me at (502) 564-3940.


GEORGE W. WAKIM, P.E., MANAGER
WATER & SEWER BRANCH, ENGINEERING DIVISION

Attachment: ProManPM-051013 Inspection Report

C: Mr. Tom Gabbard, DOW, EEC
Mr. Shafiq Amawi, DOW, EEC