

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PEGGY HOWELL, KOUNTRY CAFE	)	
	)	
COMPLAINANT	)	CASE NO.
V.	)	2011-00426
	)	
WATER SERVICE CORPORATION OF	)	
KENTUCKY	)	
	)	
DEFENDANT	)	

ORDER TO SATISFY OR ANSWER

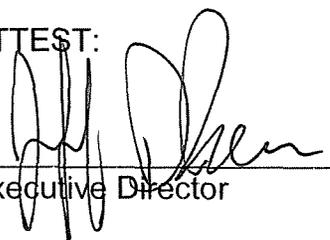
Water Service Corporation of Kentucky ("Water Service") is hereby notified that it has been named as defendant in a formal complaint filed on October 24, 2011, a copy of which is attached hereto.

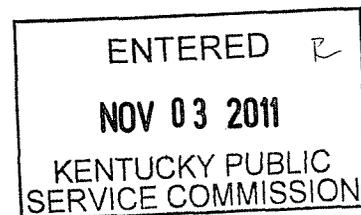
Pursuant to 807 KAR 5:001, Section 12, Water Service is HEREBY ORDERED to satisfy the matters complained of or file a written answer to the complaint within ten days of the date of service of this Order.

Should documents of any kind be filed with the Commission in the course of this proceeding, the documents shall also be served on all parties of record.

By the Commission

ATTEST:

  
Executive Director



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RECEIVED

OCT 24 2011

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

PEGGY HOWELL,  
KOUNTRY CAFÉ

COMPLAINANT

Vs.

UTILITIES INC.  
d/b/a WATER SERVICES CORP OF KENTUCKY

DEFENDANT

COMPLAINT

The complaint of Peggy Howell, respectfully shows:

(a) Peggy Howell, co-owner of Kountry Café

105 N. Washington Street, Clinton KY 42031

(b) Utilities, Inc., d/b/a Water Services Corp. of Kentucky

Utilities, Inc.'s mailing address is P. O. Box 160609 Altamonte Springs,  
Florida, 32716

Water Services Corp. of Kentucky's mailing address is P. O. Box 11025,  
Lewiston, ME 04243-9476.

(c) Complainant has on several occasions received two bills from the Defendant that are due within the same month. Complainant discussed the issue with water company personnel and was informed that the issue is with the billing system and it would not happen again.

Complainant received a bills received a bill due January 3, 2011.

Complainant received a second bill due January 28, 2011.

Complainant received a bill due May 1<sup>st</sup> (a Sunday). It was paid at Clinton City Hall, Defendant's collection agent, on Monday May 2<sup>nd</sup>.

Complainant received a second bill due on May 26, 2011.

(d) Complainant has experienced water usage rates that she has not seen since she went into business many years ago. Complainant runs a small restaurant. The facility has two rest rooms with sinks and commodes. There is a large sink in the kitchen for doing dishes. Hours of operation are from 5:30 a.m. until 1:00 pm. Monday through Friday, Saturdays 5:30 until 12 noon.

Complainant's usage fluctuates wildly. Her bill in May 2011 showed usage of 688 gallons of water per day for eight days. Her bill for September 2011 showed usage of 206 gallons daily.

The water company representative said she must have had a small leak to have used that much water. However, no leak has been detected either after the May or September bill.

(f) Complainant's bill shows a balance due when there is none due. She showed a balance due on the May 2011 bill (due on a Sunday) and again on the bill due October 2, 2011.

WHEREFORE, Complainant asks that the Kentucky Public Service Commission issue an order to Defendant to stop the practice of issuing bills that fall due within the same month;

For a review of her billing for overcharges due to faulty reading of the water meter and/or faulty computation of her bill;

For an Order Defendant to refund to her overpayments on her account;

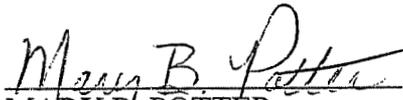
For any and all relief to which she may appear entitled.

This 19<sup>th</sup> day of October, 2011.



\_\_\_\_\_

PEGGY HOWELL, co-owner of Kountry Café



\_\_\_\_\_

MARY B. POTTER  
COUNSEL FOR PLAINTIFF  
113 NORTH WASHINGTON ST.  
CLINTON, KY 42031  
1-270-653-3312



Water Service Corp of Kentucky  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

Bill Date	Account Number	Due Date	Please Pay:
01/03/2011	[REDACTED]	1/26/2011	\$70.01

Name	KOUNTRY CAFE	Primary Telephone #	
Service Address	105 N WASHINGTON, CLINTON, KY, 42031		
<b>Activity Since Last Bill</b>			
Previous Balance		\$80.09	
Payments received as of 01/03/2011		\$-80.09	
Balance as of 01/03/2011			\$0.00
<b>Commercial Water Service</b>			
Commercial Minimum Usage Charge		\$11.64	
Next 3,100 gallons at \$6.59 per 1,000 gallons		\$20.43	
City School Tax at 3%		\$0.96	
Kentucky State Tax at 6%		\$1.92	
Total Commercial Water Service			\$34.95
<b>City of Clinton Commercial Wastewater Service</b>			
Kentucky State Tax at 6%		\$1.98	
Total City of Clinton Commercial Wastewater Service			\$35.06
<b>Total Amount Due</b>			<b>\$70.01</b>

**Summary of Service**

Meter Reading	Meter #	6057
Current	417400	12/22/2010
Previous	413300	11/24/2010
Usage	4,100 Gallons	
Number of Days:	28	
Average Daily Use:	146 Gallons	
Average Daily Cost:	\$2.50	

**Billing History**  
In dollars

**Consumption History**  
In gallons

**PAID**  
 JAN 28 2011  
 Water Service Corp of Ky

The payment for this bill is due upon receipt.  
 Make check payable to: Water Service Corp of Kentucky

Messages



Water Service Corp of Kentucky  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

Bill Date	Account Number	Due Date	Please Pay:
05/01/2011	[REDACTED]	5/26/2011	\$173.15

Name **KOUNTRY CAFE** Primary Telephone #  
 Service Address **105 N WASHINGTON, CLINTON, KY, 42031**  
 Activity Since Last Bill

Previous Balance	\$90.18	
Payments received as of 05/01/2011	\$0.00	
Balance as of 05/01/2011		\$90.18

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64	
Next 4,000 gallons at \$6.59 per 1,000 gallons	\$26.36	
City School Tax at 3%	\$1.14	
Kentucky State Tax at 6%	\$2.28	
<b>Total Commercial Water Service</b>		<b>\$41.42</b>

**City of Clinton Commercial Wastewater Service**

Kentucky State Tax at 6%	\$2.35	
<b>Total City of Clinton Commercial Wastewater Service</b>		<b>\$41.55</b>

**Total Amount Due \$173.15**

**Summary of Service**

Meter Reading Meter # 7317  
 Current 63 04/26/2011  
 Previous 13 03/31/2011  
 Usage 50 Units  
 Number of Days: 28  
 Average Daily Use: 179 Gallons  
 Average Daily Cost: \$2.96

**Billing History**  
 in dollars

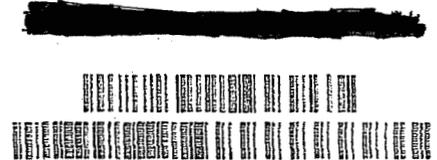
**Consumption History**  
 in gallons

The payment for this bill is due upon receipt.  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

Our records indicate the prior balance remains unpaid and your account may be subject to disconnection. Please note the due date on this bill refers to the current bill amount and does not extend the time allowed for payment of the prior balance.  
 Paperless billing is now available. Please visit our Web Self Service site where you can obtain account information and register for paperless billing. The site may be accessed by going to <http://www.uiwater.com/myaccount>.

**Utilities, Inc.**  
 PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: [REDACTED] Amount Paid  
 Due Date: 5/26/2011  
 Please Pay: \$173.15

**\$82.97**

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**KOUNTRY CAFE**  
 105 N WASHINGTON  
 CLINTON KY 42031-1232

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back



Water Service Corp of Kentucky  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

Bill Date	Account Number	Due Date	Please Pay:
10/02/2011	[REDACTED]	10/27/2011	\$200.48

**Summary of Service**

Meter Reading Meter # 7317  
 Current 334 09/23/2011  
 Previous 268 08/22/2011  
 Usage 66 Units  
 Number of Days: 32  
 Average Daily Use: 206 Gallons  
 Average Daily Cost: \$3.31

**Billing History**  
 In dollars

**Consumption History**  
 In gallons

Name **KOUNTRY CAFE** Primary Telephone #  
 Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance \$94.49  
 Payments received as of 10/02/2011 \$0.00  
 Balance as of 10/02/2011 \$94.49

**Commercial Water Service**

Commercial Minimum Usage Charge \$11.64  
 Next 5,600 gallons at \$6.59 per 1,000 gallons \$36.90  
 City School Tax at 3% \$1.46  
 Kentucky State Tax at 6% \$2.91  
 Total Commercial Water Service \$52.91

**City of Clinton Commercial Wastewater Service**

Kentucky State Tax at 6% \$3.00  
 Total City of Clinton Commercial Wastewater Service \$53.08

**Total Amount Due \$200.48**

200.48  
 94.49  
 105.99

The payment for this bill is due upon receipt.  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

Our records indicate the prior balance remains unpaid and your account may be subject to disconnection. Please note the due date on this bill refers to the current bill amount and does not extend the time allowed for payment of the prior balance.



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: [REDACTED] Amount Paid:   
 Due Date: 10/27/2011  
 Please Pay: \$200.48

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KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031-1232



Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back

James Leonard  
Regional Manager  
Water Service Corporation of Kentucky  
1221 East Cumberland Avenue  
Middlesboro, KY 40965

Mary B Potter  
113 North Washington Street  
Clinton, KENTUCKY 42031