

DORSEY, GRAY, NORMENT & HOPGOOD

ATTORNEYS-AT-LAW

318 SECOND STREET

HENDERSON, KENTUCKY 42420

June 2, 2017

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FEDEX

RECEIVED

Dr. Talina Rose Mathews
Executive Director
Kentucky Public Service Commission
Post Office Box 615
Frankfort, KY 40602

JUN 20 2017

**PUBLIC SERVICE
COMMISSION**

Re: South Hopkins Water District

(1) Clifford Albert Marquis - No. 2017-00225

(2) Application - No. 2017-00237

Dear Dr. Mathews:

Enclosed for filing please find the original and six (6) copies of South Hopkins Water District Response to Complaint in Case No. 2017-00225 and original and eight (8) copies of its Response to Deficiency Letter and Motion to Hold in Abeyance in Case No. 2017-00237.

Your assistance in these matters is appreciated.

Very truly yours,

DORSEY, GRAY, NORMENT & HOPGOOD

By



J. Christopher Hopgood

Attorney for South Hopkins Water District

JCH/cds
Encls.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2017-00225

RECEIVED

JUN 20 2017

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

CLIFFORD ALBERT MARQUIS

PLAINTIFF

V.

RESPONSE TO COMPLAINT

SOUTH HOPKINS WATER DISTRICT

DEFENDANT

Defendant, South Hopkins Water District ("South Hopkins"), submits the following Response to the Complainant's Complaint pursuant to the Order of June 12, 2017:

1. South Hopkins has no record of a request to disconnect the Marquis service at 469 Lick Creek Road, Dawson Springs, KY 42408.
2. South Hopkins' records show the Marquis account paid \$10.54 in January 2017, for the December 2016, but did not make a payment in February for the January 30, 2017, bill (\$10.54). \$10.54 was billed to this account on February 24, 2017, and as a result of non-payment, the service was disconnected on February 28, 2017.
3. On March 7, 2017, Darlene Marquis called South Hopkins about the meter disconnect. She paid \$73.82 by credit card for the water usage, disconnect fee and credit card fee. However, she requested that the service not be restored and no work order was issued to restore service.
4. On March 13, 2017, the Marquis meter was read and showed 11,550 gallons used from February 9, 2017, to March 13, 2017. South Hopkins' employees added the account to re-read and South Hopkins made a call to the customer's phone number on file but the customer did not call back. The account was billed on March 29, 2017, for \$69.23, (11,550 gallons) and payment of this amount was received on April 11, 2017.

5. On March 23, 2017, Superintendent Jon Blalock and employee Mark Menser inspected the meter and it was spinning indicating a leak. Superintendent Blalock contacted the South Hopkins office, gave the current reading, and was advised that 317,470 gallons of water had gone through the meter since March 13, 2017. At that point, superintendent Blalock turned off the meter due to the possibility of a leak. Attempts to contact the customer at the customer's (434) area code number on file were unsuccessful.
6. On April 28, 2017, the customer was billed \$1,354.28 for the 317,960 gallons used from March 13, 2017 through April 10, 2017 billing period (in actuality through March 23, 2017).
7. On May 10, 2017, Darlene Marquis called about the bill. She was advised by Kayla Goodaker of South Hopkins that if the high usage is due to a leak, the bill will be adjusted down by 50% once the leak is repaired. Subsequently, Clifford Marquis admitted by telephone conversation that he had left the faucets open after winterizing the house.
8. On May 11, 2017, Superintendent Blalock advised Darlene Marquis that South Hopkins' employees had not turned her meter on. Later that day, it was explained to Darlene Marquis that the bill could not be adjusted under the leak policy because there was no leak. However, South Hopkins would establish a payment plan to pay the high bill.
9. All employees of South Hopkins have been questioned as to whether the Marquis service was restored after March 7, 2017, and all have advised that the meter service was not restored.
10. South Hopkins does not have automated meters. The only way to restore service is to manually do so at the meter. Because South Hopkins did not mistakenly restore the service, it cannot be responsible for the usage.
11. The excess usage was due to Clifford Marquis' decision to leave his faucets open. Had Clifford Marquis disconnected service for the months he was away or only left his faucets on

a slow drip, he could have avoided the end result. Further, if the home has a master valve on the customer side of the meter, turning the water on at the meter would not have resulted in usage.

12. Attached hereto is the Marquis account summary and credit card receipt for March 7, 2017.

VERIFICATION

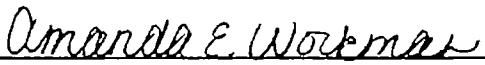
I, Jon Blalock, Superintendent of South Hopkins Water District verify the foregoing statements are true and correct to the best of my belief and knowledge.



Jon Blalock

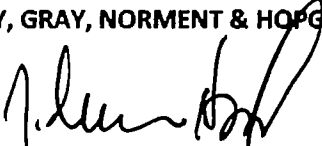
State of Kentucky
County of Hopkins

The foregoing was subscribed and sworn to before me by Jon Blalock this the 19 day of June, 2017.



Notary Public ID# 554003
My Commission expires: April 8, 2020

DORSEY, GRAY, NORMENT & HOPGOOD

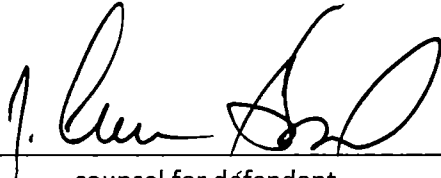
By 

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Counsel for South Hopkins Water District
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on the plaintiff herein by mailing a true and correct copy of same, postage prepaid, to him as follows, on this 19th day of June, 2917:

Clifford Albert Marquis
469 Lick Creek Road
Dawson Springs, KY 42408



counsel for défendant

South Hopkins Water District
129 South Main Street PO Box 487
Dawson Springs, KY 42408 (270) 797-5760

South Hopkins Water District
Customer History Report

Service Type WT WATER
 AR Code All
 Beginning Date 05/01/2016
 Ending Date 05/12/2017

Use Reading Factor
 Start Balance With Zero
 Print Transaction in Descending Order
 Print Breakdown By Transaction Service Taxes Totals Only
 Usage Service WT WATER

History For Account 0013-01076-003 Marquis, Cliff

Trm Date	Void	Post By	Code	Description	Service Description	Usage	Check #	Amount	Unapplied	Balance
07/28/16		Mary Ann	333	Water Billing	WATER	220		\$10.54	\$0.00	\$10.54
08/16/16		kayla	100	Cash Receipt				(\$11.59)	\$0.00	(\$1.05)
08/16/16		Mary Ann	222	Penalty Billing				\$1.05	\$0.00	\$0.00
08/30/16		Mary Ann	333	Water Billing	WATER	0		\$10.54	\$0.00	\$10.54
09/15/16		Mary Ann	100	Cash Receipt				(\$10.54)	\$0.00	\$0.00
09/28/16		Mary Ann	333	Water Billing	WATER	0		\$10.54	\$0.00	\$10.54
10/07/16		Mary Ann	100	Cash Receipt				(\$10.54)	\$0.00	\$0.00
10/28/16		Mary Ann	333	Water Billing	WATER	80		\$10.54	\$0.00	\$10.54
11/07/16		Mary Ann	100	Cash Receipt				(\$10.54)	\$0.00	\$0.00
11/29/16		Mary Ann	333	Water Billing <i>Dec</i>	WATER	20		\$10.54	\$0.00	\$10.54
12/16/16		Mary Ann	222	Penalty Billing				\$1.05	\$0.00	\$11.59
12/28/16		Mary Ann	333	Water Billing <i>Jan</i>	WATER	0		\$10.54	\$0.00	\$22.13
12/28/16		Mary Ann	100	Cash Receipt				(\$11.59)	\$0.00	\$10.54
01/16/17		Mary Ann	100	Cash Receipt				(\$10.54)	\$0.00	\$0.00
01/30/17		Mary Ann	333	Water Billing <i>Feb</i>	WATER	0		\$10.54	\$0.00	\$10.54
02/16/17		Mary Ann	222	Penalty Billing				\$1.05	\$0.00	\$11.59
02/24/17		Mary Ann	333	Water Billing <i>Mar</i>	WATER	0		\$10.54	\$0.00	\$22.13
03/07/17		Mary Ann	100	Cash Receipt				(\$22.13)	\$0.00	\$0.00
03/29/17		Mary Ann	333	Water Billing <i>April</i>	WATER	11,550		\$69.23	\$0.00	\$69.23
04/11/17		Mary Ann	100	Cash Receipt				(\$69.23)	\$0.00	\$0.00
04/26/17		Mary Ann	333	Water Billing <i>May</i>	WATER	317,960		\$1,354.28	\$0.00	\$1,354.28
Total For Selection								\$1,354.28	\$0.00	\$1,354.28
Ending Balance								\$1,354.28	\$0.00	\$1,354.28