

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

NEEDHAM BETZ THOROUGHBREDS, INC.)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2019-00373
)	
KENTUCKY-AMERICAN WATER COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO NEEDHAM BETZ THOROUGHBREDS, INC.

Needham Betz Thoroughbreds, Inc. (Needham Betz Thoroughbreds) pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the individual responsible for responding to questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entities that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Needham Betz Thoroughbreds shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Needham Betz Thoroughbreds fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Needham Betz Thoroughbreds shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide copies of all documentation concerning Needham Betz Thoroughbreds construction of the well in 2015. Be sure to include all permit approvals from local or state governmental agencies if applicable.

2. Explain whether Needham Betz Thoroughbreds performs leak detection on the customer-owned portion of its water service line, and whether leaks in its service line have ever been detected.

- a. If so, provide when the leaks were found.

b. If leaks were found, state whether Needham Betz Thoroughbreds contacted Kentucky-American with regard to the leaks, the date the contact was made, and all correspondences regarding the same.

3. Refer to Needham Betz Thoroughbred's Complaint, unnumbered page 3, paragraph 2, in which it was stated that the, "well was equipped at that time with a separation system so that the system could be switched to KAW supplied service in the event of a marked decrease in water quality from the well."

- a. Explain in full detail what is meant by a separation system.
- b. Explain what is meant by the well was equipped "at that time" with a separation system.
- c. State whether a separation system is currently still in place.



Kent A. Chandler
Executive Director
Public Service Commission
P.O. Box 615
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DATED FEB 10 2020

cc: Parties of Record

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