

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOY AND MATTHEW LEE)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2024-00279
)	
FARMDALE WATER DISTRICT)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO FARMDALE WATER DISTRICT

Farmdale Water District (Farmdale District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on May 21, 2026. The Commission directs Farmdale District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission mandated electronic filing, with exception to *pro se* formal complaints filed against utilities). *Pro se* parties in formal complaint cases may submit responses by U.S. Mail addressed to the Public Service Commission at 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615, or by electronic email sent to PSCED@ky.gov. Responses filed using electronic email should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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 entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry. Farmdale District shall serve a copy of its response on Joy and Matthew Lee by U.S. Postal Service First Class mail at 877 S. Benson Road, Frankfort, Kentucky 40601.

Farmdale District shall make timely amendment to any prior response if Farmdale District obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Farmdale District fails or refuses to furnish all or part of the requested information, Farmdale District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Farmdale District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

A copy of this request shall be served on Joy and Matthew Lee by U.S. Postal Service First Class mail at 877 S. Benson Road, Frankfort, Kentucky 40601.

1. Provide a detailed description of each water leak on the subject properties since April 2022, to include:

- a. A description of each leak;
- b. The date of each leak that was identified;
- c. Whether the leak was repaired and, if repaired, the date of repair;
- d. The identity of who repaired each leak; and
- e. Any credits, and the amount of such credits, issued by Farmdale

District in relation to each leak.

2. Provide all records of water usage for the Complainants' meter, also known as the Bradley Barn Meter, as read, from April 2022 through December 2022 in Farmdale District's possession.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601-8294

DATED **MAY 05 2026**

cc: Parties of Record

Service List for 2024-00279

Joy L. Lee
877 South Benson Road
Frankfort, KY 40601

* Honorable Damon R Talley
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KY 40507-1801

* Farmdale Water District
100 Highwood Drive, Route 8
Frankfort, KY 40601

* Tina C. Frederick
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KY 40507-1801