COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KARL DAVID BRADLEY, JR.	)	
	)	CASE NO.
COMPLAINANT	)	2006-00163
	)	
V.	)	
	)	
BATH COUNTY WATER DISTRICT	)	
	)	
DEFENDANT	)	

FIRST DATA REQUEST OF COMMISSION STAFF
TO KARL DAVID BRADLEY, JR.

Pursuant to 807 KAR 5:001, Commission Staff requests that Karl David Bradley, Jr. file the original and six copies of the following information within 10 days of the date of this request, with a copy to all parties of record. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility.

1. Refer to Bath County Water District's ("Bath County") responses to the First Data Request of Commission Staff and explain why you believe it is reasonable to order Bath County to provide an extension of service. Address each response by Bath County individually and in detail.

2. Have you made an attempt to survey the customers that desire water service in the area in question? If so, fully explain your attempts and provide a list of potential customers indicating if they are recreational or permanent residences.

3. Are you or any other potential customers willing to contribute to the cost of completing a project to extend water service?

4. Identify any source of funding you are aware of for this project.

5. Do you believe the city of Frenchburg was reasonably diligent in attempting to obtain funding? Explain why.

6. You state in your complaint, paragraph no. 7, that Frenchburg Water Department is less economically competitive as a potential supplier. Explain the information on which you base this belief.

7. Do you agree that the requested service is currently outside Bath County's territory?

8. Explain what efforts you have made to obtain service other than filing this complaint with the Commission.

Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, Kentucky 40602

DATED September 7, 2006

cc: All Parties