



c. If Kingston-Terrill intends to commission such study,

(1) State the date when the study was commissioned and its expected completion date.

(2) Identify the person preparing the study and list all cost-of-service studies which he or she has previously prepared.

2. Provide all contracts between Richmond and Kingston-Terrill.

3. a. Identify the source(s) of the allegations contained in Paragraph 9 of Kingston-Terrill's Complaint.

b. Provide all documents upon which the allegations of Paragraph 9 are based.

4. a. What is the basis of the allegations in Paragraph 12 of Kingston-Terrill's Complaint that Richmond's current wholesale water service rates unfairly subsidize the water service rates of Richmond retail water customers?

b. Provide all studies and reports within Kingston-Terrill's possession which address the issue of alleged subsidization.

5. Provide all correspondence between Kingston-Terrill and Richmond regarding Richmond's efforts to assess additional charges for water purchases in excess of a contract limit.

6. a. Is Kingston-Terrill's position that any additional charges for water purchases in excess of a contract limit are unjust and unreasonable?

b. Explain Kingston-Terrill's position on such charges.

7. Provide all correspondence, internal memorandum, studies and reports or related documents which discuss Kingston-Terrill's future demand and its future expansion plans.

8. a. Has Kingston-Terrill discussed its proposed expansion plans with Estill County officials?

b. If yes, state these officials' position toward the proposed expansion.

c. If no, when does Kingston-Terrill expect to enter into such discussions?

9. List for each calendar year from 1985 to 1995 the number of customers which Kingston-Terrill served at the end of the calendar year.

Done at Frankfort, Kentucky, this 15th day of March, 1996.

PUBLIC SERVICE COMMISSION

  
For the Commission

ATTEST:

  
Executive Director