## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| KINGSTON-TERRILL WATER DISTRICT  | )                 |
|--|-------------------|
| COMPLAINANT  | )                 |
| v.   | ) CASE NO. 95-460 |
| THE CITY OF RICHMOND, KENTUCKY, A MUNICIPAL CORPORATION; AND THE RICHMOND WATER, GAS, AND SEWAGE WORKS | )<br>)<br>)       |
| DEFENDANTS   | )<br>)<br>)       |

## ORDER

IT IS HEREBY ORDERED that Kingston-Terrill Water District ("Kingston-Terrill") shall file the original and 12 copies of the following information with the Commission, with a copy to all parties of record, within 20 days of the date of this Order. Where such information has previously been provided in the format requested herein, reference may be made to the specific location of this information in responding to this Order. Kingston-Terrill shall furnish with each response the name of the witness who will be available at the public hearing to respond to questions concerning each item of information requested.

- 1. a. Provide all cost-of-service studies within Kingston-Terrill's possession which examine the cost of water service provided by Richmond Water, Gas, and Sewerage Works ("Richmond").
- b. If Kingston-Terrill does not possess such studies, does it intend to commission one for this proceeding?

- 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