

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

A SPECIAL CONTRACT BETWEEN HENRY COUNTY)
WATER DISTRICT NO. 2 AND CHRIS McGEHEE AND) CASE NO. 2001-392
LAND REALTY, INC. FOR LINE IMPROVEMENTS)
)

COMMISSION STAFF S INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS TO
HENRY COUNTY WATER DISTRICT NO. 2

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Henry County Water District No. 2 ("Henry District") file the original and 8 copies of the following information with the Commission within 20 days of the date of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. 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. Provide all correspondence between Henry District, Chris McGehee, and Land Realty, Inc. (Land Realty) in which water service to Hall Farm Division is discussed.
2. Provide the minutes of each meeting of Henry District s Board of Commissioners in which the proposed contract was discussed.
3. List and describe Henry District s existing facilities in the general vicinity of the proposed real estate subdivision development.

4. Provide a map of suitable scale of the general area in which the proposed real estate development is to be located. Indicate on this map the proposed real estate development, all existing Henry District facilities, and any facilities that Henry District will construct to serve the proposed real estate development.

5. Describe the proposed real estate development's expected average hourly and daily demand.

6. a. State whether Henry District can provide water service to the proposed real estate development with its existing facilities.

b. If Henry District cannot provide water service to the proposed real estate development with its existing facilities, identify the facilities that are needed solely to provide water service to the proposed real estate development.

7. a. Describe the current hydraulic state of Henry District's water distribution system in the area in which the proposed real estate development is to be located.

b. Describe the hydraulic effect upon Henry District's water distribution system if service is provided to the proposed real estate development without constructing any of the required improvements.

c. Describe the hydraulic state of Henry District's water distribution system if service is provided to the proposed real estate development and the required improvements are constructed. Provide all studies, notes, and workpapers used and all assumptions relied upon to prepare such descriptions.

8. Identify who calculated the hydraulic effect of service to the proposed real estate development upon Henry District's service. State this person's position and describe his qualifications to make such calculation.

9. Describe how the hydraulic effect of service to the proposed real estate development was derived.

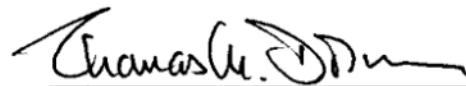
10. Describe how the proposed improvements will return Henry District to the same hydraulic condition that existed prior to service to the proposed real estate development.

11. State the number and type of customers that Henry District serves in the general vicinity of the proposed real estate development.

12. State whether the required improvements will enable Henry District to serve other customers within the general vicinity of the proposed real estate development who previously were not served.

13. If the proposed improvements will enable Henry District to serve other customers within the general vicinity of the proposed real estate development who previously were not served, explain why Mr. McGehee and Land Realty should not be granted a refund for each customer who connects directly to the proposed improvements.

14. Identify the person or entity that first proposed that Mr. McGehee and Land Realty make improvements to Henry District's water distribution system to offset any hydraulic effects of serving the proposed real estate development.



Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602

DATED: January 24, 2002

cc: Parties of Record