

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE)
WATER SERVICE RATES OF THE CITY OF) CASE NO. 2002-00022
PIKEVILLE, KENTUCKY)

COMMISSION STAFF S FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
CITY OF PIKEVILLE, KENTUCKY

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that city of Pikeville, Kentucky ("Pikeville") file the original and 8 copies of the following information with the Commission no later than March 22, 2002, with a copy to all parties of record. Each copy of the information requested shall 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 shall be given to copied material to ensure its legibility. 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.

1. Refer to Pikeville s Response to Commission Staff s Interrogatories and Requests for Production of Documents of February 5, 2001 in Case No. 2000-00540.¹

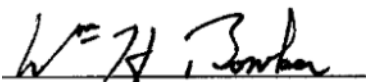
¹ Case No. 2000-00540, Proposed Adjustments of the Wholesale Water Service Rates of the City of Pikeville, Kentucky (Ky.PSC Oct. 8, 2001).

a. If presented with the same interrogatories and requests in this proceeding, would Pikeville's response be the same as its response in Case No. 2000-00540?

b. For each interrogatory or response to which Pikeville's current response would differ from that given in Case No. 2000-00540, state how Pikeville's response would differ.

2. Has Pikeville ever invoked its right under the Agreement for Operations and Maintenance Services with Professional Services Group, Inc. to inspect or request copies of documents concerning the operation of its utility operations? If no, explain why not.

3. Provide all records, invoices, and documents concerning the operation of Pikeville's water treatment and distribution operations during the test period that are maintained by PSG.


William H. Bowker
Deputy Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602

DATED: 3/8/02

cc: Parties of Record