COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO SIMPSON COUNTY WATER DISTRICT S RATE SCHEDULE FOR SERVICES WITH PRIVATE FIRE PROTECTION FACILITIES

) CASE NO. 2002-00041

COMMISSION STAFF S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO SIMPSON COUNTY WATER DISTRICT

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Simpson County Water District ("Simpson District") file the original and 8 copies of the following information with the Commission within 20 days of this request, 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 should be given to copied material to ensure its legibility.

1. Provide all rate analyses and cost-of-service studies that Simpson District has performed or commissioned since January 1, 1980. For each study provided, state the name and position of its author.

2. Provide all documents and materials related to its rates for water service that Simpson District submitted to the Farmers Home Administration or Rural Development since January 1, 1980 to support its applications for loans or grants from those agencies.

3. Provide all correspondence, internal memoranda, notes, and other documents created since January 1, 1980 in which Simpson District, its officers, or employees have discussed or calculated the customer charge component or commodity component of Simpson District s rates for water service.

4. State whether a water utility s rate for fire protection service (in the absence of any water usage) should be based upon the customer charge component of the water utility s minimum bill. Explain.

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

DATED: <u>April 15, 2002</u>

cc: Parties of Record