

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KEN MERIDETH)	
)	
COMPLAINANT)	
)	
v.)	CASE NO. 2005-00313
)	
WARREN COUNTY WATER DISTRICT)	
)	
DEFENDANT)	

ORDER TO SATISFY OR ANSWER

Warren County Water District ("Warren District") is hereby notified that it has been named as defendant in a formal complaint filed on July 26, 2005, a copy of which is attached hereto.

Pursuant to 807 KAR 5:001, Section 12, Warren District is HEREBY ORDERED to satisfy the matters complained of or file a written answer to the complaint within 10 days from the date of service of this Order.

Should documents of any kind be filed with the Commission in the course of this proceeding, the documents shall also be served on all parties of record.

Done at Frankfort, Kentucky, this 29th day of July, 2005.

ATTEST



Executive Director

By the Commission



Greenwood Skate Center

A handwritten signature in black ink, possibly reading 'J.S.' or similar, located to the right of the main title.

506 Three Springs Road • Bowling Green, Kentucky 42104 • Telephone (270) 843-3394

RECEIVED

JUL 26 2005

PUBLIC SERVICE
COMMISSION

CASE 2005-00313

July 23, 2005

Enclosed are 15 copies of a formal complaint-

Thank You ,

A handwritten signature in black ink that reads 'Ken'.

Ken Merideth

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

Ken Merideth (Greenwood Skate Center)

COMPLAINANT

VS.

Warren County Water District

DEFENDANT

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PUBLIC SERVICE
COMMISSION

COMPLAINT

The complaint of Ken Merideth respectfully shows:

- (a) Ken Merideth (Greenwood Skate Center)
506 Three Springs Road
Bowling Green Ky. 42104
- (b) Warren County Water District
523 US 31W Bypass
Bowling Green Ky. 42102
- (c) That: Warren County Water District has encouraged the development of combined use systems for fire sprinkler systems, and other water usage. (Ref-Testimony of BRADD, and Ken Merideth in Case No 2002-00040). That: Warren County Water District narrowed the scope of case No 2002-00040 to the point that it did not include any combination connections, and was applied to dedicated sprinkler systems only. That: Warren County Water District has not had a general rate review for twenty years, and has used a back door approach for specific rate increases. That: The Kentucky Attorney Generals Opinion in case 2002=00040 was that this issue could be better addressed in a general rate revue. That: The Public Service Commission ruled in "385" that there could be no commodity factor in figuring access for a fire sprinkler system. That: Warren County Water District has encouraged, and required the installation of combination connections in the past. (The Water District's

Formal Complaint

Ken Merideth, Greenwood Skate Center vs. Warren County Water District

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requirements have the final say on how a connection is effected, either dedicated, or a combination connection for a fire sprinkler system) (Ref- Testimony of Alan Vilines in case 2002-00040). That: There are more combination Connections for Fire Sprinkler Systems on the Warren County Water District System than dedicated systems. (Ref – Testimony of Alan Vilines in Case 2002-00040). That: The Warren County Water District has already put in place the equipment for separating the commodity charge from the fire sprinkler charge (Double Detector Check Valves were installed during the period of time that WCWD was charging two bills- one for the one inch house water line, and a separate standby fee for the four inch fire suppression line.) That Warren County Water Districts own testimony shows the cost of meter replacement to be \$24.70 every thirteen years (Bennett & Williams, Inc), and thus cost cannot justify the present charges. That: Fire Sprinklers Work, Prevent Loss of Property and Lives, and that the ISO does not include any building with an approved sprinkler system in its community ratings, saving drastically on the amount of physical plant a water utility must invest in for that community. That: The use of Fire Sprinklers should be encouraged, not only for their protection of life and property, but their use helps to lesson the needs for larger pipes, more water towers, and to help the utility to provide better fresher water due to a faster turnover of the water (AWA materials introduced by Bowling Green Fire Dept. in case 2002-00040). That: WCWD's current charges, plus the additional fee assessed for low water usage amounts to extortion by WCWD. (See attached letter dated May 11 2005 from WCWD). That the intent of "385" in removing standby fees from fire sprinkler access has not been applied to combination connections. That: in an Open Records Request sent to WCWD for the names of other business locations with combination connections I was denied this information. That WCWD is doing everything in their power to extort commodity charges for water they are not supplying to customers. That this "Ghost Accounting System" has allowed them to charge for many millions of gallons water that were never delivered. That this system of accounting for water usage invalidates all records submitted to the PSC, or applications for any and all grants where water usage, and loss figures are stated. IE: The Skate Center uses about 11,000 gallons of water a month, but is charged for 100,000 gallons. This leaves a ghost account of 89,000 gallons per month for one location, multiply this times the estimated 60 customers with combination connections = 5,340,000 gallons pre month, or over 64 million gallons of ghost water per year.

Wherefore, complainant asks That: Warren County Water District be required to come into compliance with the letter, and spirit of "385", and remove all standby

Formal Complaint

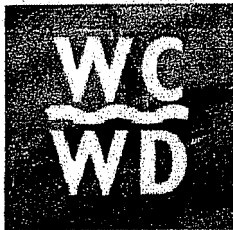
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fees from all fire sprinkler charges. That Warren County Water District be allowed to only charge for the actual amount of water used by any customer with a fire sprinkler system. That Warren County Water District be subjected to a General Rate Review, and that all accounts be audited and made public. That there be some standard of audit, and reporting established for all public utilities (Every Four Years?) That: Warren County Water District, and all water districts in the state be required to furnish to local fire departments a list of any and all customers who have a fire sprinkler system- either dedicated, or combination, and notice of what type of connection it is. That: Warren County Water District cease and desist from any additional fees, surcharges, or fines against a business for having the best fire protection they can provide to the community. That common sense, and logic be applied to this issue.

Dated at Bowling Green, Kentucky, this 23rd day of July, 2005.


Signature



WARREN COUNTY WATER DISTRICT



may 19941
Sept 161.43
March 162.66

TO: Baggett Enterprises
FROM: Alan Vilines
Assistant General Manager
DATE: May 11, 2005
SUBJECT: Private Fire Protection Service

The Kentucky Public Service Commission (PSC) recently reached a decision in the case involving customers of the Water District that have service connections used solely for private fire protection. In their Order the PSC established separate rates to be used for this type of service. The Water District now has two rate schedules: 1) private fire protection rates which will be used for connections where the only purpose is to supply a customer's fire protection facilities and 2) regular general service rates which apply to all other customers.

Because your water connection provides domestic/commercial service combined with your private fire protection service, the regular general service rate applies. Depending on the water usage on each customer's account, the monthly bill may or may not differ from what it has been under previous rates.

Based on our review of your consumption history it appears you have a lower volume of water usage relative to meter size and therefore, there is an increase in your bill.

If you have any questions about the PSC Order, your bill, or if we can be of assistance in any way, please call me at 270-842-0052, ext. 550.

AHV:jh