

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)	

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

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Warren County Water District ("Warren 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 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. 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. Provide all correspondence that Warren District has received from or sent to the Complainant.

2. Provide all correspondence, internal memoranda, electronic mail messages, and other internal documents in which water service to Complainant is discussed.

3. Provide the minutes of all meetings of Warren District's Board of Commissioners since January 1, 1980, in which water service to "506 Three Springs Road, Bowling Green, Kentucky" has been discussed.

4. Provide the minutes of all meetings of Warren District's Board of Commissioners since January 1, 1990, in which private fire protection service has been discussed.

5. List the names and addresses of all current Warren District customers who receive private fire protection service through a service connection that also provides domestic/commercial service and who began receiving such service prior to March 29, 2005.

6. Refer to Memorandum of Alan Villines to Baggett Enterprises (May 11, 2005). State whether Warren District sent similar memoranda to customers whose water connection, as of March 29, 2005, provided domestic/commercial service combined with private fire protection service. If yes, list the names and addresses of those customers.

7. Provide the application that Baggett Enterprises executed with Warren District for water service to "506 Three Springs Road, Bowling Green, Kentucky."

8. Provide the water service agreement that Warren District has with Baggett Enterprises to provide water service to "506 Three Springs Road, Bowling Green, Kentucky."

9. State when Warren District began assessing a rate for private fire protection service that differed from its rate for general service and contained no commodity component.

10. Refer to Warren District's Answer at 2. Explain why "[i]t would have been to the Water District's advantage to have two separate services."

11. State whether, prior to December 22, 2000, it was not economically more beneficial for a customer who required private fire protection service to take that service and domestic/commercial service through a single connection rather than take service through separate connections. Explain.

12. Describe the circumstances, if any, under which it would be reasonable for Warren District customers who received domestic/commercial service combined with private fire protection service prior to December 22, 2000 to receive such service under different terms than those persons who are currently applying for private fire protection and domestic/commercial service.

13. State when Warren District currently expects to apply for a general rate adjustment that is not subject to the provisions of KRS 278.015 or KRS 278.023.



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED: July 13, 2006

cc: Parties of Record