

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ANNETTE D. CALVERT	)	
	)	COMPLAINANT
	)	
v.	)	
	)	CASE NO. 2005-00356
U.S. 60 WATER DISTRICT OF SHELBY AND	)	
FRANKLIN COUNTIES	)	
	)	
	)	DEFENDANT

COMMISSION STAFF'S INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO U.S. 60 WATER DISTRICT OF SHELBY  
AND FRANKLIN COUNTIES

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that U.S. 60 Water District of Shelby and Franklin Counties ("U.S. 60 Water District") file the original and 4 copies of the following information with the Commission within 14 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. Describe how U.S. 60 Water District currently provides water service to the Complainant's property at 575 Old U.S. Highway 60.

2. Identify the “government agency” that is mentioned in Mr. Donald T. Prather’s letter of February 16, 2005 to the Complainant.

3. Describe the water main for which an easement across the Complainant’s property is necessary.

4. State whether the Complainant will be directly served through the proposed water main for which an easement from Complainant is sought.

5. a. State whether the Complainant or her predecessors in interest have previously provided U.S. 60 Water District with an easement over the property at 575 Old U.S. Highway 60.

b. If an easement was previously provided to U.S. 60 Water District,

(1) Provide a copy of the easement.

(2) State the date the easement was executed.

(3) Describe the circumstances under which the easement was provided.

6. List the facilities of U.S. 60 Water District that are currently located on the Complainant’s property at 575 Old U.S. Highway 60.

7. Provide a map of the Complainant’s property that shows the location of all present and planned U.S. 60 Water District facilities.

8. Explain why the provision of U.S. 60 Water District’s tariff that addresses easements (Paragraph I.F - Easements) is reasonable.

9. Explain why a customer should be required to provide a future easement for a water utility’s lines.

10. Describe the limitations or restrictions, if any, upon the type of water line for which a customer under Paragraph I.F must provide an easement.

11. State the number of times since January 1, 1990 in which U.S. 60 Water District has exercised its power of eminent domain to condemn an easement for its water mains.

12. State the number of times since January 1, 1990 that U.S. 60 Water District has discontinued water service to an existing customer as a result of the customer's failure to provide an easement for a water line.

13. State the number of customers for whom U.S. 60 Water District has discontinued water service as a result of the customer's failure to provide an easement for the water main in question.

14. State the effect on U.S. 60 Water District's operations if the Commission were to find that a customer's refusal to provide easements for future facilities that are not replacements of existing facilities currently used to serve the customer may not serve as the basis for discontinuing water service.

15. Provide all correspondence, electronic mail traffic, or other forms of written or electronic communication between U.S. 60 Water District and customers of U.S. 60 Water District who initially refused or contested the water district's right to obtain an easement across their property for the water main in question in this case.



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

DATED: February 24, 2006

cc: Parties of Record