

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JULIA LYNN JOHNSTONE	)	
	)	
COMPLAINANT	)	
V.	)	CASE NO.
	)	2008-00502
SOUTH ANDERSON WATER DISTRICT	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS TO  
SOUTH ANDERSON WATER DISTRICT

Pursuant to 807 KAR 5:001, Commission Staff requests that South Anderson Water District ("District") file the original and six copies of the following information with the Commission no later than May 20, 2009, with a copy to all parties of record. Responses to requests for information shall be appropriately bound, tabbed and indexed and shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The District shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the District fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Identify all persons who prepared and are responsible for the District's Response to the Commission's Order to Satisfy or Answer dated December 18, 2008.

2. When did Julia Lynne Johnstone ("Ms. Johnstone") first begin water service with the District?

3. Has Ms. Johnstone's water service continued uninterrupted since that date? If not, when was she not a customer?

4. Provide copies of all District records that pertain to Ms. Johnstone's water service from the District, including, but not limited to, all billing statements, inspection reports, correspondence, notices, and memoranda of transactions between the District and Ms. Johnstone.

5. Prior to the current dispute, have there been other disagreements between the District and Ms. Johnstone? If so, describe.

6. Prior to July 1, 2008, had the District inspected any structure, appurtenance, or equipment which is a part of the District's water system that specifically provides water service to Ms. Johnstone? Please provide copies of any reports generated as the result of these inspection(s).

7. Prior to July 1, 2008, had the District inspected Ms. Johnstone's service line and plumbing, including a review of a shut-off valve and a one-way check valve, from the point of service to Ms. Johnstone's point of usage? Please provide copies of any reports generated as the result of said inspection(s).

8. Is it the District's position that there was/is no shut-off valve on Ms. Johnstone's service line?

9. Prior to providing water service to a new customer, does the District routinely inspect the customer's service line? Was this done when Ms. Johnstone began receiving water service?

10. When did the District begin providing water service to 1021 Hammonds Creek Road, Lawrenceburg, Kentucky?

11. Is a licensed plumber required to install or repair District property? When is a District customer required to use the services of a licensed plumber?

12. Under what circumstance does the District send a high-usage notice to a customer? If high usage continues after a notice is sent, does the District do a follow-up?

13. Does the District physically inspect the lines where high usage is noted?

14. Please refer to District's Answer, Item E, identified as a July 15, 2008 invoice to Ms. Johnstone. Was this the same invoice that was sent to Ms. Johnstone after the repairs were made?

15. Who made the decision to charge Ms. Johnstone for these repairs?

16. Why was Hyatt Plumbing retained for this particular job?

17. Is Hyatt Plumbing under contract with the District? If so, please provide a copy of said contract.

18. Does the District have a licensed plumber on its staff?

19. Could District employees have done the work performed by Hyatt Plumbing?

20. Has the District used the services of Hyatt Plumbing in other matters?

21. What is Shannon's last name? What is his position with the District?

22. What services were rendered by District personnel during the 1.5 hours expended on this job?

23. Why were two separate District vehicles used?

24. Please provide Hyatt Plumbing's itemized bill to the District for its work on this particular job on July 14, 2008.

25. Who made the determination that the "feed line had been damaged to Ms. Johnstone's meter from turning service on and off repeatedly," and what was this determination based on?

26. Has the District repaired other feed lines in the past ten years and, if so, when were these repairs made?

27. Were outside contractor(s) used to make the repairs? If so, who were the other contractors?

28. On what side of the meter were the damaged lines located?

29. What caused the damage?

30. How was the cause determined?

31. What was the total cost of making the repairs?

32. Who paid for these repairs?

33. How many times did Ms. Johnstone turn the water service on and off?

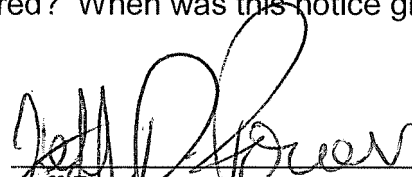
What is this number based on?

34. When did the District become aware that water service was being turned on and off by Ms. Johnstone?

35. When Ms. Johnstone's meter was read for billing purposes, could the meter reader see that the water service was turned off?

36. On what side of the meter were the repairs made to the feed line?

37. Did the District notify Johnstone that a shut-off valve and one-way check valve at the outlet side of the meter were required? When was this notice given?



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DATED: MAY 11 2009

cc: Parties of Record

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