

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
JULIA LYNN JOHNSTONE

Pursuant to 807 KAR 5:001, Commission Staff requests that Julia Lynn Johnstone ("Ms. Johnstone") file the original and six copies of the information requested 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.

Ms. Johnstone shall make timely amendment to any prior response if she 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 Ms. Johnstone fails or refuses to furnish all or part of the requested information, she shall provide a written explanation of the specific grounds for her 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 Ms. Johnstone's Complaint filed with the Commission on December 4, 2008.
2. Identify all persons who prepared and are responsible for the Response to this Data Request to Ms. Johnstone.
3. When did Ms. Johnstone first receive water service from South Anderson Water District ("District")?
4. Has water service from the District remained ongoing since that date?
5. Did Ms. Johnstone receive "high usage" notes from the District on or about February 18, 2008 and March 31, 2008?
6. What action, if any, did Ms. Johnstone take as a result of these notices?
7. When did Ms. Johnstone first turn water service on and off at the meter?

8. Since that date, approximately how many times has the water service been turned on and off at the meter?

9. Did Ms. Johnstone ever have a shut-off valve and one-way check valve? If so, when?

10. Does Ms. Johnstone have a shut-off valve and one-way check valve at this time?

11. When did Ms. Johnstone first notify the District that she was turning water on and off at the meter?

12. Has Ms. Johnstone ever filed a complaint or had a dispute with the District prior to this situation? If so, how was the matter resolved?

13. How many times did Ms. Johnstone check the status of the water leak at the meter after notifying the District of the leak on July 2, 2008?

14. Describe the method and equipment Ms. Johnstone used to turn the water on and off at the meter?

15. What is the basis for Ms. Johnstone's statement that there is not a "measurable difference" between a plumber's key and the actual equipment she used to turn the meter on and off?

16. Is it Ms. Johnstone's position that, because she brought a leak to the District's attention, the District should not bill her for subsequent repairs?

17. What is the basis for Ms. Johnstone's position that "the determination was made from the outset to hold me financially liable regardless, as demonstrated by subsequent events"?

18. Is it Ms. Johnstone's position that she had a right to turn the water on and off at the meter? If yes, what is the basis for this position?



Jeff Derouen
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DATED: MAY 11 2009

cc: Parties of Record

Julie Johnstone
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Eddie Stevens
Chairman/Commissioner
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