

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF HARDIN COUNTY WATER	)	
DISTRICT NO. 1 TO MODIFY WATER UTILITY	)	CASE NO.
TARIFF OF MASTER METERS FOR BILLING	)	2009-00113
MULTI-UNIT RESIDENTIAL PROPERTIES	)	

SECOND INFORMATION REQUEST OF COMMISSION  
STAFF TO HARDIN COUNTY WATER DISTRICT NO. 1

Hardin County Water District No. 1 (“Hardin District”), pursuant to 807 KAR 5:001, is to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on or before April 9, 2009. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response 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 the 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.

Hardin 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

Hardin 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 shall 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.

For the purposes of this information request, the abbreviation “MHPs” means the mobile home parks to which the proposed tariff would currently apply.

1. a. For each MHP, identify the date that Hardin District began providing water service to the property owner or units on the property.

b. For each MHP, identify the date on which Hardin District required that individual units be individually metered.

c. If the specific information requested in (a) is unknown and inaccessible, identify each MHP that was not in existence before June 7, 1992. For the purposes of this item, the term “existence” relates to whether there was an MHP with more than one unit that received water from Hardin District either as a customer or as a tenant of a master-metered property owner.

d. For each MHP identified in (c), identify each individual MHP on which Hardin District has metered each individual unit.

e. For each MHP identified in (d), identify whether the individual unit's meters are located at that point on or near the street right-of-way or property line most accessible to the utility from its distribution system.

2. State whether, in Hardin District's opinion, Hardin District has acquired under Kentucky law a prescriptive easement for water lines located in MHPs. Explain.

3. State the number of individual unit meters in MHPs that remain in service and have not been tested for 10 years or longer.

4. Refer to Item 4 of the proposed tariff.

a. (1) State whether Hardin District would disconnect water service to the MHP and its residents if the MHP owner refused to open an account.

(2) If Hardin District proposes to disconnect an MHP's water service for refusal to open an account, reconcile this position with the Commission's finding in Case No. 2007-00461<sup>1</sup> that the water district could not terminate water service to the mobile home community for nonpayment because the residential customers who may be paying their bills would lose water service.

b. Identify the statutory or regulatory basis under which Hardin District may open an account for an MHP resident if the MHP owner refuses to provide certain information.

c. Explain why Hardin District would establish an account for an MHP resident if the resident is not a customer of the water district and any water that the resident consumes is billed to the MHP owner.

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<sup>1</sup> Case No. 2007-00461, Hardin County Water District No. 1's Proposed Tariff Allowing the Use of Master Meters in Manufactured Housing Communities (Ky. PSC Aug. 14, 2008).

5. Describe the conditions under which a meter would be “not accessible” under Item 5 of the proposed tariff.

6. a. Item 5(d) of the proposed tariff provides that, under certain circumstances, the MHP will not be given any credit for amounts subsequently billed to the tenant.

(1) State whether Hardin District would bill the resident for all usage prior to the problem’s resolution.

(2) State whether Hardin District would only bill the resident for water passing through that meter after the problem is resolved.

b. Explain why, if Hardin District bills the resident for all usage prior to the problem’s resolution, it should be able to collect rates from the MHP owner and resident for the same water.

7. 807 KAR 5:011, Section 2, states: “If a utility furnishes more than one (1) kind of service (water and electricity for example), a separate tariff must be filed for each kind of service.” State whether a separate tariff (other than the one for which approval is jointly sought) would be necessary for an MHP master-metered customer to be billed based on the sewer charges.

8. Explain why a master-metered MHP customer should be billed for equivalent sewer charges.

9. State whether Hardin District intends to install flow meters to determine the amount of wastewater exiting the MHP and flowing into Hardin District’s wastewater system.

10. Provide the basis for the proposition that water passing through an MHP master meter but not being billed to an individual unit eventually flows into Hardin District's wastewater facilities.

11. State whether the master-metered MHP customers will be charged a customer meter charge.

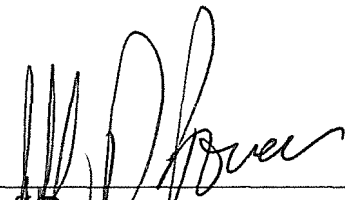
12. a. State whether the master-metered MHP customers will be charged the wholesale rate, which is currently set at \$1.92 per 1,000 gallons, or the "Volume Charge," which is set at \$4.42 per 1,000 gallons for the first 15,000 gallons and \$3.16 for each 1,000 gallons thereafter.

b. If master-metered customers are to be charged at the Volume Charge rates, state whether a master-metered customer will be required to pay \$4.42 per 1,000 gallons for the first 15,000 gallons it is billed even if individual units collectively surpass 15,000 gallons of usage during a given month.

13. Describe how Hardin District would address the situation if an MHP master meter indicated lower usage than was collectively billed to the individual units within that MHP.

14. State whether the proposed tariff will apply to future mobile home communities.

15. State whether Hardin District intends to require future mobile home communities to be exclusively unit-metered. Explain.



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Jeff Derduen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED: MAR 24 2010

cc: Parties of Record

Honorable Robert C Moore  
Attorney At Law  
Hazelrigg & Cox, LLP  
415 West Main Street  
P.O. Box 676  
Frankfort, KY 40602

Brett Pyles  
Manager  
Hardin County Water District #1  
1400 Rogersville Road  
Radcliff, KY 40159-0489

Honorable David T Wilson II  
Attorney at Law  
Skeeters, Bennett, Wilson & Pike  
550 West Lincoln Trail Boulevard  
P.O. Box 610  
Radcliff, KY 40160