

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF PURCHASE PUBLIC)
SERVICE CORPORATION AND PADUCAH-)
MCCRACKEN COUNTY JOINT SEWER AGENCY)
TO APPROVE THE TRANSFER OF OPERATIONS) CASE NO. 2013-00333
OF THE BLANDVILLE WEST SUBDIVISION)
WASTEWATER TREATMENT FACILITIES TO)
PADUCAH-MCCRACKEN COUNTY JOINT)
SEWER AGENCY)

COMMISSION STAFF'S REQUEST FOR INFORMATION
TO PURCHASE PUBLIC SERVICE CORPORATION AND PADUCAH-MCCRACKEN
COUNTY JOINT SEWER AGENCY

Purchase Public Service Corporation ("PPSC") and Paducah-McCracken County Joint Sewer Agency ("JSA") (collectively "Joint Applicants"), pursuant to 807 KAR 5:001, are to file with the Commission no later than October 28, 2013 the original and five copies of the following information, with a copy to all parties of record. 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 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.

Joint Applicants shall make timely amendment to any prior response if they obtain 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 Joint Applicants fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their 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.

1. List and describe the nature of all legal actions in which JSA is a party and which involve the operations of its sewer operations.
2. List and provide a copy of each notice of violation ("NOV") that JSA has received regarding the operation of its sewer facilities from the Kentucky Division of Water since January 1, 2008. State the current status of each NOV.
3. List and provide a copy of each NOV that PPSC has received regarding the operation of its sewer facilities from the Kentucky Division of Water since January 1, 2008. State the current status of each NOV.
4. Provide all correspondence between JSA and the Kentucky Division of Water regarding JSA's acquisition of PPSC's facilities.
5. State the distance from JSA's nearest sewer collection mains to PPSC's sewer collection mains in the Blandville West Subdivision.

6. Describe JSA's current plans to connect its sewer collection mains to PPSC's sewer collection system in the Blandville West Subdivision. Include in this description all estimates of the cost to extend JSA's facilities to the Blandville West Subdivision.

7. Provide a copy of JSA's current rate schedule for sewer service.

8. State the rates that JSA intends to charge persons currently served by PPSC upon completion of the transfer.

9. a. State whether PPSC is currently holding any customer deposits.

b. If PPSC is holding customer deposits, describe the actions that will be taken regarding these deposits upon the transfer of PPSC's sewer facilities.

10. Provide a copy of JSA's current regional facility plan. In lieu of submitting an original and ten copies in paper medium, an electronic version in portable document format on electronic storage medium may be submitted.

11. Provide a copy of all appraisals of the assets to be transferred that have been performed since January 1, 2008.

12. List and describe all material changes to JSA's financial condition since June 30, 2012.

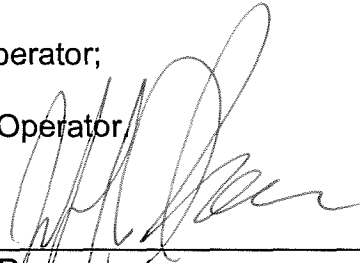
13. State whether the description of JSA's wastewater collection and treatment assets as found in *Kentucky Wastewater Management Plan* is accurate.¹

14. State the value at which the McCracken County Property Valuation Administrator assesses the property that will be transferred to JSA.

¹ The most current version of this plan is available at http://kia.ky.gov/NR/rdonlyres/9A094655-E931-4A98-8F07-914CE0A50D2E/0/CW_ManagementPlan_State_062513.pdf.

15. List the name and class of each each JSA employee who the Kentucky Energy and Environment Cabinet has certified as:

- a. Wastewater Treatment Plant Operator;
- b. Wastewater Collection System Operator;



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602

DATED OCT 17 2013

cc: Parties of Record

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Melissa D Yates
Attorney
Denton & Keuler, LLP
555 Jefferson Street
P. O. Box 929
Paducah, KENTUCKY 42002-0929