

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TARIFF FILING OF LEXINGTON-FAYETTE	)	
URBAN COUNTY GOVERNMENT TO INCREASE	)	CASE NO.
SANITARY SEWER TAP-ON OR CONNECTION	)	2014-00204
FEES APPLIED TO JESSAMINE-SOUTH	)	
ELKHORN WATER DISTRICT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

Lexington-Fayette Urban County Government ("LFUCG") is requested, pursuant to 807 KAR 5:001, 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 no later than 15 days from the date of this request. 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.

LFUCG 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

LFUCG fails or refuses to furnish all or part of the requested information, LFUCG 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 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. In response to Item 1 of the Appendix attached to the June 20, 2014 Order, LFUCG references a “federal consent decree order requiring it to spend hundreds of millions of dollars to enhance and maintain its sanitary sewer system.” Provide a copy of the federal consent decree.

2. Provide a detailed explanation of how the revenues from the “table fees” codified in Section 16-60 of the Code of Ordinances, LFUCG, (the “Code”) are expended.

3. Provide in detail the procedures used for the initial development of the “table fees” in Section 16-60 of the Code.

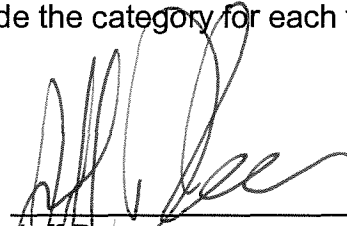
4. When were the “table fees” in Section 16-60 of the Code first implemented?

5. Cite any legal authority allowing a local government to charge in excess of the actual cost of installing equipment and facilities necessary to physically connect a property to the sewer system.

6. Explain the process LFUCG used to determine that that the Consumer Price Index for All Urban Consumers, the U.S. City Average, published by the Bureau of

Labor Statistics, is an accurate and reasonable indicator of the actual cost increases associated with providing the services reflected in the "table fees" in Section 16-60 of the Code.

7. In response to Item 3 of the Appendix attached to the June 20, 2014 Order, LFUCG indicates that only 166 tap-on fees have been paid by the district. Provide a list by year of each tap-on fee paid. Include the category for each fee.



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Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED: JUL 24 2014

Cc: Parties of Record

Honorable David J. Barberie  
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