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ATTORNEYS AT LAW
215 STANLEY REED COURT
MAYSVILLE, KENTUCKY 41056-1177

RECEIVED

JAN 10 2005

PUBLIC SERVICE
COMMISSION

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* ADMITTED TO OHIO BAR

5 January 2005

Ms. Beth O'Donnell
Environmental and Public Protection Cabinet
Public Service Commission
211 Sower Boulevard
PO Box 615
Frankfort, Kentucky 40602-0615

Dear Ms. O'Donnell

RE: **Case No. 2004-00384**

Enclosed find the original and eight copies of the City of Maysville and Southern Mason Water District's Answers to Interrogatories and Request for Production of Documents in subject case.

Sincerely



M. Susan Brammer

Enclosures

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January 5, 2005 (9:46am)

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
JAN 10 2005
PUBLIC SERVICE
COMMISSION

In the Matter of:

JOINT APPLICATION OF SOUTHERN)
MASON WATER DISTRICT AND THE)
CITY OF MAYSVILLE FOR AN ORDER)
AUTHORIZING THE TRANSFER OF)
UTILITY ASSETS PURSUANT TO KRS)
278.020(5) AND (6))

CASE NO. 2004-00384

ANSWER TO INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS

Comes City of Maysville, Kentucky and Southern Mason Water District, by counsel, and hereby submit the following Answers to the Commission Staff's Interrogatories and Requests for Production of Documents:

1. Provide copies of the Maysville Utility Commission's ("Maysville") financial statements that were filed for fiscal years ending June 30, 2001, 2002, and 2003. Provide the financial statement for the fiscal year ending June 30, 2004.

Answer: Maysville Utility Commission's financial statements for fiscal years ending June 30, 2001, 2002, and 2003 are included in the City of Maysville, Kentucky financial statements which are attached to the Application as Exhibits K, L, and M. The financial statement for the fiscal year ending June 30, 2004 has not yet been prepared by the auditors.

2. Refer to Southern Mason Water District's ("District") 2003 annual report. The report shows a Customer Deposit balance of \$5,800 and a Customer Deposit Fund of \$9,673.

a. Provide a current, individual listing of all active customers who paid a deposit. For each customer, provide the amount of deposit and date paid as well as the last date interest was paid on the account and the amount of interest paid.

Answer: Attached. The attached list is comprised of all current customers who still have deposit on file with Southern Mason Water District. All other current customers have had their deposit returned.

b. For the Customer Deposit Fund account, provide the average annual rate at which interest was earned by the District on this account for 1999 to date.

Answer: Customer Deposit Fund account is the small business checking account. Customer deposits are made the day received and deposited into the small business checking account. Interest is earned at an accrued rate of 1.34%. Southern Mason Water District does not have the figures for the amount earned in the years 1999 through 2002. In the year 2003, \$14.12 interest was earned. 2004 to date is \$0.32.

c. State whether the District plans to refund all accrued interest on customer deposits prior to closing.

Answer: The District will refund all accrued interest on customer deposits prior to closing.

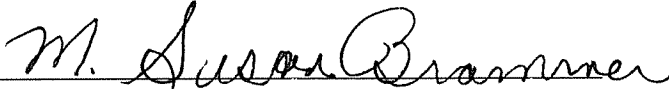
3. The application states that Maysville has agreed to maintain the District's current water rate for 5 years. Explain how the rate will be changed after 5 years.

Answer: After five years, the customers of Southern Mason Water District will be charged as the same rates as current City of Maysville, Kentucky customers. The water rates currently being charged by Maysville are attached to the Application as Exhibit C.

ATTORNEYS FOR PLAINTIFF

**ROYSE, ZWEIGART, KIRK,
BRAMMER & CAUDILL**

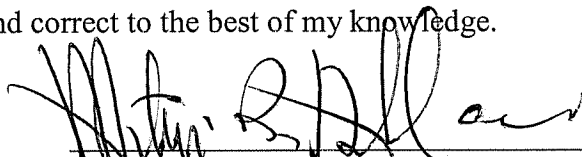
215 Stanley Reed Court
Maysville, Kentucky 41056
Phone: 606-564-4012
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By 
M. Susan Brammer

The Answers to Interrogatories 1 and 3 of the foregoing Interrogatories are true and correct to the best of my knowledge.


Romie Griffey, City Manager of City of Maysville

The Answer to Interrogatory 2 is true and correct to the best of my knowledge.


Martin Halleran, Chairman, Southern Mason Water District

SOUTHERN MASON WATER DISTRICT

NAME	ACCOUNT #	DEPOSIT	DEPOSIT	AMT. INT.	INTEREST
		AMOUNT	PAID	PAID	LAST PAID
Naomi Lanter	44800	50.00	01/14/95	0*	
Steven Ritchie	5500	30.00	06/15/88	0.90	07/01/00
George Roush	36645	30.00	11/12/88	0*	
Donald Feeney	700	30.00	11/12/92	0.90	12/30/02
Troy Doyle	22400	30.00	04/28/93	0.90	05/01/01
Steve Lofton	21300	30.00	02/13/93	0.90	04/01/01
Anthony Fulton	1860	30.00	06/27/95	0.90	07/01/01
Greg Walters	16600	30.00	11/01/95	0*	
Nancy Prince	44700	50.00	03/05/96	1.50	05/01/99
William Boulden	22000	50.00	06/11/97	1.50	07/01/01
Chris Scott	13000	50.00	09/24/97	3.00	12/29/04
David Vonderbrink	46150	50.00	10/10/97	1.50	12/01/02
Chris Spencer	26610	30.00	05/26/98	0.90	12/29/04
Smart Services	1830	30.00	10/04/98	0.90	12/01/02
Burch Moreland	3210	30.00	05/08/99	1.80	12/29/04
Mark Fontaine	1850	50.00	04/12/99	0*	
Jill McKibben	36780	30.00	05/20/99	1.80	12/29/04
Tammy Jo Williams	41200	30.00	05/28/99	0.90	06/01/00
Wayne Hamilton	45600	30.00	06/11/99	1.80	12/29/04
Jennie Felice	5550	30.00	06/14/99	1.80	12/29/04
Milton Brindley	49450	50.00	06/21/99	3.00	12/29/04
Micheal LeMaster	16900	30.00	07/15/99	0.90	08/01/02
Pamela Lewis	13100	50.00	07/21/99	0*	
Dovie LeMaster	15700	30.00	07/31/99	0.90	12/29/04
Lamarr Fox	21900	30.00	10/12/99	0.90	11/01/00
Mike Martin	1820	50.00	05/10/99	3.00	12/29/04
Rocky Moran	47550	50.00	11/20/99	1.50	12/29/04
David Baker	44410	30.00	02/01/02	1.80	12/29/04
Wayne Kirker	34600	30.00	03/20/00	1.80	12/29/04
Lisa Moore	6850	30.00	05/13/00	0.90	12/29/04
Robert Kelly	26450	30.00	05/08/00	1.80	12/29/04
Robert Lynn	22100	50.00	05/31/00	0*	
Gerald Arnett	27200	30.00	06/23/00	0.90	07/01/02
William Thomas	5300	30.00	07/14/00	0.90	12/29/04
William Bennett	500	30.00	08/07/00	1.80	12/29/04
Ray Miller	4040	30.00	08/18/00	1.80	12/29/04
Darrin Renchen	9501	30.00	09/05/00	0.90	10/01/02
Ray Smith	36700	30.00	10/05/00	0.90	11/01/02
Christine James	36625	50.00	10/31/02	1.50	12/29/04
Milton Flora	43301	50.00	10/31/02	3.00	12/29/04
Jim Batey	26500	30.00	11/09/02	1.80	12/29/04
Joshua Jimison	1550	25.00	11/22/00	0*	
Lowe Brothers	27050	50.00	12/11/00	1.50	12/29/04
Charles Norman	44420	30.00	02/21/01	0.90	03/01/02
Troy Bess	44750	30.00	03/17/01	1.80	12/29/04
Patti Berry	31051	50.00	04/23/01	1.50	05/01/02
Tabitha Wade Rust	5200	30.00	05/18/01	0.90	06/01/02
Clyde Bellows	29521	30.00	06/13/01	1.80	12/29/04
Gary Mattox	36637	30.00	06/29/01	1.80	12/29/04

NAME	ACCOUNT #	DEPOSIT	DEPOSIT	AMT. INT.	INTEREST
		AMOUNT	PAID	PAID	LAST PAID
Dewey Jimison	1525	30.00	08/01/01	0*	
Eddie Outlaw	44470	30.00	08/03/01	1.80	12/29/04
Alan Brubeck	44415	30.00	08/16/01	1.80	12/29/04
Ted Timmons	26400	30.00	08/20/01	1.80	12/29/04
Joel McCann	2700	30.00	10/29/01	1.80	12/29/04
Calvin Hunt	34900	50.00	11/06/01	1.50	12/01/02
Arthur Davenport	36671	30.00	11/15/01	0.90	12/02/02
Roger Fulton	30321	100.00	11/29/01	3.00	12/01/02
Gladys Saunders	5570	30.00	02/22/02	0*	
Ted Kinnett	39850	30.00	03/05/02	1.80	12/29/04
Troy Pugh	29805	30.00	03/06/02	1.80	12/29/04
Debbie Evans	19100	30.00	03/15/02	1.80	12/29/04
Randall K. Thomas	18801	30.00	03/15/02	0*	
Jessica Harvey	38310	50.00	05/02/02	0*	
Mark True	19200	30.00	06/15/02	0*	
Crystal Jones	16205	50.00	07/13/02	3.00	12/29/04
Cynthia Reynolds	34300	30.00	07/14/02	1.80	12/29/04
Robert Cook	44480	30.00	08/06/02	1.80	12/29/04
Darrell Deatley	14400	50.00	08/19/02	0*	
Chris Breeze	26620	30.00	08/20/02	1.80	12/29/04
John Smith	29442	30.00	09/24/02	1.80	12/29/04
George Rich	45750	30.00	10/05/02	0*	
Thomas Woosley	31218	30.00	10/14/02	0*	
John Cord	31220	30.00	11/07/02	0*	
Mark Gray	44475	30.00	11/25/02	1.80	12/29/04
John Purcell	35300	30.00	12/03/02	1.80	12/29/04
Roger Rowlett	1840	30.00	12/03/02	1.80	12/29/04
Misha Caudill	36770	30.00	02/01/03	0.90	12/29/04
Roger Carpenter	4300	50.00	03/10/03	0*	
Brian Smith	49700	30.00	03/18/03	0*	
Cassidee Deatley	13800	30.00	03/20/03	0.90	12/29/04
Brad Johnson	46200	50.00	04/03/03	1.50	12/29/04
Cindy Farrow	3600	50.00	04/15/03	0*	
Larry Howell	31274	30.00	04/30/03	0.90	12/29/04
Sharon Workman	31700	50.00	05/01/03	1.50	12/29/04
Randy Miller	34700	30.00	05/13/03	0*	
Tara Prater	31221	30.00	05/15/03	0.90	12/29/04
Bill Gray	18100	50.00	05/27/03	0*	
Mark Jones	44405	50.00	06/09/03	1.50	12/29/04
Ben Taylor	46600	50.00	06/30/03	1.50	12/29/04
Karen Rothwell	45090	30.00	07/03/03	0.90	12/29/04
S.C. Shepherd	44050	30.00	07/03/03	0*	
Jana Boyle	14100	50.00	07/17/03	1.50	12/29/04
Andrea Baker	47300	30.00	07/29/03	0.90	12/29/04
Irving Peck	7550	30.00	07/29/03	0.90	12/29/04
Carl Haywood	43575	30.00	08/13/03	0.90	12/29/04
Ross Biddle	5400	30.00	08/14/03	0.90	12/29/04
Derek Flaughter	44450	30.00	08/22/03	0.90	12/29/04
Ernie Nickell	11100	50.00	08/25/03	1.50	12/29/04
Jack Rainey	50300	30.00	10/24/03	0.90	12/29/04

NAME	ACCOUNT #	DEPOSIT	DEPOSIT	AMT. INT.	INTEREST
		AMOUNT	PAID	PAID	LAST PAID
Carolyn Fields	30150	100.00	10/27/03	3.00	12/29/04
Josh Prather	47700	30.00	10/27/03	0.90	12/29/04
Chasity Creech	35500	50.00	10/28/03	0*	
Eagle Ridge Retreat	300	30.00	10/30/03	0.90	12/29/04
Dereteo Ignacia	38700	100.00	11/10/03	1.50	12/29/04
Debbie Burch	13200	100.00	02/11/03	0*	
Terri Damell	21000	30.00	12/15/03	0.90	12/29/04
Bob Tribby	44432	30.00	12/16/03	0.90	12/29/04
Johnny Smith	26640	30.00	01/05/04		
Carl Daugherty	3050	30.00	01/12/04		
Tennia Denning	35000	30.00	01/20/04		
Dinah Thomas	26700	30.00	01/26/04		
Joe Fleming	50200	30.00	01/27/04		
Raymond Simmons, Jr.	39510	30.00	02/02/04		
Eric Henson	46750	30.00	02/05/04		
Emily Wallingford	31270	30.00	02/26/04		
Lashonda Johnson	41400	30.00	03/01/04		
Mike Haywood	43400	50.00	03/22/04		
Doug Mellor	26050	30.00	03/25/04		
William Coblentz	45101	30.00	03/25/04		
Jeff Stewart	49200	30.00	04/05/04		
Abram Keating	50100	30.00	04/05/04		
Joseph Coblentz	28900	30.00	05/01/04		
James Mast	39200	30.00	05/06/04		
Steve Lang	6550	30.00	05/10/04		
Michael Crane	24150	30.00	05/17/04		
Joey Greenwell	29820	30.00	05/20/04		
David Colemire	31600	50.00	05/27/04		
Shena Mastin	32200	50.00	06/01/04		
Robert Preston	18500	50.00	06/15/04		
Ryan Kissell	3200	30.00	07/27/04		
Lynn Chaney	18000	30.00	08/01/04		
Frank Day	43082	30.00	08/16/04		
Stephanie Terry	31000	50.00	08/20/04		
James Frederick	21400	100.00	09/23/04		
Brandy Gordley	43600	50.00	09/27/04		
Brit Combess	2800	50.00	10/02/04		
Irving Peck	7400	30.00	10/15/04		
Lisa Goins	31850	50.00	11/15/04		
Tina Yazell	150	50.00	11/25/04		
Mike Fredrick	44434	30.00	12/01/04		
James Huddleston	36660	50.00	12/14/04		
Doug McCarty	4701	50.00	12/27/04		
0* = delinquent at anniversary date - no interest paid.					
Year 2004 has not earned interest yet.					