

CROLEY & MOORE, PSC

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LaGrange, Kentucky 40031

William P. Croley
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(502) 222-5607
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August 18, 2005

RECEIVED

AUG 22 2005

PUBLIC SERVICE
COMMISSION

Beth O'Donnell, Executive Director
Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, Kentucky 40602-0615

Re: Acquisition of territory of the Oldham County Water District on Allen Lane
by the LaGrange Utilities Commission
Case No. 2005-00016

Dear Ms. O'Donnell:

Please correct your records to reflect that I am legal assistant to William P. Croley who is attorney for the Oldham County Water District.

I apologize for any confusion.

✓ SA Aug 22, 05

Sincerely yours,

CROLEY & MOORE, PSC

Nikki L. Moore

Nikki L. Moore
Legal Assistant

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
AUG 22 2005
PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF OLDHAM COUNTY WATER)
DISTRICT FOR APPROVAL OF PLANNED DE-) CASE NO. 2005-00016
ANNEXATION OF TERRITORY ON ALLEN LANE)

**OLDHAM COUNTY WATER DISTRICT'S
VERIFIED RESPONSES TO COMMISSION STAFF'S
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Comes now Oldham County Water District for its response to Commission Staff's Requests for Production of Documents, and states as follows:

1. Provide a map that shows the area to be de-annexed and Oldham District's current boundaries and proposed boundaries after de-annexation.

RESPONSE: See attached map.

2. a. Provide a copy of the notice(s) of the de-annexation hearing that the Oldham County Judge/Executive conducted on November, 2004.

RESPONSE: See attached copy of Notice of Filing of Petition to De-Annex Certain Territory in Oldham County.

b. Identify the newspaper in which notice was published and the dates of publication.

RESPONSE: Oldham Era, September 29, 2004 and October 20, 2004,

3. Provide the rates that the LaGrange Utilities Commission will charge for water service to the persons in the area to be de-annexed.

RESPONSE: See attached rate schedule from LaGrange Utilities Commission.

4. List and describe all objections to and complaints and comments regarding the proposed de-annexation that Oldham District has received from the persons residing in the proposed de-annexed area.

RESPONSE: No objections or complaints have been received and no objections were voiced at the hearing.

5. a. State whether Oldham District is required to obtain the consent of any of its creditors for the proposed boundary change.

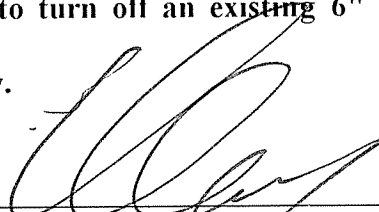
RESPONSE: John Covington, II, Treasurer, Kentucky Infrastructure Authority, responded by telephone to the attached correspondence from Oldham County Water District, advising that Kentucky Infrastructure Authority has no objection to the proposed boundary change.

b. If consent of creditors is required, identify each creditor who must consent and state whether Oldham District has obtained such consent from that creditor.

RESPONSE: See Response 5(a) above. No other consent is believed or known to be required.

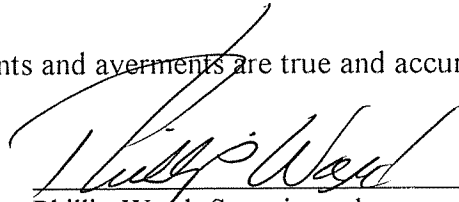
6. Describe the changes to Oldham District's distribution system that must occur for the proposed transfer to customers to LaGrange Utilities Commission.

RESPONSE: The only necessary change is to turn off an existing 6" gate valve located on Allen Lane within the de-annexed territory.



WILLIAM P. CROLEY
CROLEY & MOORE, PSC
P.O. Box 229
LaGrange, Kentucky 40031
ATTORNEY FOR OLDHAM COUNTY
WATER DISTRICT

This is to verify that the foregoing statements and averments are true and accurate to the best of my knowledge and belief.

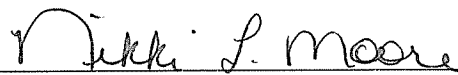


Phillip Ward, Superintendent
Oldham County Water District

STATE OF KENTUCKY)
)
COUNTY OF OLDHAM)

Subscribed and sworn to before me by Phillip Ward, Oldham County Water District Superintendent, this the 18th day of August 2005.

My commission expires 4-20-09



NOTARY PUBLIC
KENTUCKY, STATE AT LARGE



KRS 426.705; balance due in 60 days; property is indivisible; sold free & clear of all liens encumbrances & interest of parties except current year taxes affecting purchr shall take no credit; easements restrictions & stipulations; matters disclosed by survey or inspection; current assessments for public improvements levied. Successful bidder shall carry fire & extended insurance on improvements from sale date until purchase price fully pd to extent of Ct appraisal or unpd balance of purchase price, w/loss payable clause to Commr or ptfs herein. No warranty of title. Amt to be raised-\$243,802.32. Deposit 10% of purchase price. Laura Drake, Atty. Doreen Goodwin, POB 54, LaGrange Ky; 222-9898.

Amt to be raised-\$126,786.07. Deposit 10% of purch price. Wm Clarke, Atty. Doreen Goodwin, POB 54, LaGrange Ky; 222-9898.

**COMMISSIONER SALE
DOREEN S. GOODWIN, COMMISSIONER
OLDHAM CO. CIRCUIT COURT--
NO. 03CI00731;
LOU YACHT CLUB ASSN., PTF VS.
JOS. JARLES, ET AL, DEFS**

Per terms of Judgment in Oldham Circuit Ct, Commr will sell at 10:00 am October 12, 2004 at public action to highest bidder at Oldham Co Courthouse, Oldham Co, Ky; property described as Unit 110, a Condo Unit in Louisville Yacht Club in Deed Bk 262, P 333 et seq., in Deed Bk 264 P 400 et seq. In Condo Bk 1 P 5 et seq. WITH an undivided surplusage accruing to property. Address: #110 Lou Yacht Club. Terms 10% & bond per KRS 426.705, balance due in 60 days; property is indivisible; sold free & clear of all liens encumbrances & interest of parties except state co & school taxes for 2001-2004 & all taxes thereafter purchr shall have no credit; easements, restrictions & covenants; assessments for public improvements levied; facts which inspection & accurate survey disclose. No warranty of title. Amt to be raised-\$38,671.11. Deposit 10% of purch price. Richard Bush, Atty. Doreen Goodwin, POB 54, LaGrange Ky; 222-9898.

NOTICE OF FILING OF PETITION TO DE-ANNEX CERTAIN TERRITORY IN OLDHAM COUNTY.

Notice is hereby given that a petition has been filed with the County Judge/Executive of Oldham County by the Oldham County Water District, petitioning this County Judge/Executive to de-annex certain territory.

A hearing regarding the de-annexation territory will be held on said petition on November 2, 2004, at 2:00 p.m., before the Oldham County Judge/Executive in the Oldham Fiscal Court Building, 100 West Jefferson Street, La Grange, Kentucky.

The description of the boundary of the territory to be de-annexed from Oldham County Water District is as follows:

All that land lying in Oldham County, Kentucky, and lying within the following described boundary:

All of Oldham County Water District's territory bounded on the west by Allen Road, on the north by Kentucky Highway 148, on the east by Kentucky Highway 53, and on the south by Interstate 71. Provided, however, that Oldham County Water District will serve all customers whose property abuts Allen Road and who are served by a service line connected to the Oldham County Water District's existing water main along Allen Road, except for any customers whose property abuts or lies south of Commerce Parkway who will be served by La Grange Utilities Commission.

Within thirty (30) days after the first publication of this Notice, any resident of the Oldham County Water District, or of the above-described territory proposed to be de-annexed from the Oldham County Water District, may file with the Oldham County Judge/Executive any objections and exceptions to said petition, and such party may be heard at the time of the hearing set out above.

William P. Crowley
Attorney for Oldham County Water District

**COMMISSIONER SALE
DOREEN S. GOODWIN, COMMISSIONER
OLDHAM CO. CIRCUIT COURT--NO.
04CI00110;
WASHINGTON MUTUAL BANK, PTF VS.
MICHAEL E. WEBB, ET AL, DEFS**

Per terms of Judgment in Oldham Circuit Ct, Commr will sell at 10:00 am October 12, 2004 at public action to highest bidder at Oldham Co Courthouse, Oldham Co, Ky; property described as a house & lot on N side of Hwy 22 about 1 mile W of Crstwd, Ky, as: Beg at pin in rt/way of Hwy 22 corner to L 5; w/L 5 N 18 deg 44' W 320 ft to corner w/L 5 & portion of L 4 owned by Chas Reis; w/line of ReIs N 63 deg 30' E 150 ft to corner of ReIs & L 3; w/line of L 3 S 18 deg 44' E 320 ft to corner of L 3 in rt/way line of Hwy 22; w/N rt/way of Hwy 22 S 63 deg 30' W 150 ft to beg. Being slerly part of L 4 on plat of Crstwd add in Deed Bk 69 P 264 (above description is from a new survey made 10-23-54 by JFR Allison, Ky Professional Engineer #1587). Address: 7131 W Hwy 22 Crestwood, Ky. Terms 25% & bond per KRS 426.705, balance due in 90 days; property is indivisible; sold free & clear of all liens encumbrances & interest of parties except 2004 taxes & subsequent years purchr shall have no credit; easements & restrictions. USA maintains a Rt of Redemption under 28 USC 2410. No warranty of title. Amt to be raised-\$121,342.01. Deposit 25% of purchase price. Philip Ratliff, Atty. Doreen Goodwin, POB 54, LaGrange Ky; 222-9898.

2004 S

2004 State and Co
Oldham County by
due dates for dis
already computed)

2%
October

November

January

February

**TAX BILL
TAXPAYERS
RESPONSIB
MORTGAGE**

If you do not receive
Sheriff's office at
payment, please in
returned to you, yo

Office hours for the
p.m., except Thur

Questions regard
directed to the pro

IMPORTANT NOTI
Payments made of
delinquent tax cla
and a Sheriff's Ad
Sheriff's Delinque
penalty, a 20% Co

LEGRANGE UTILITY COMMISSION

DUDHAM COUNTY WATER

GALLONS	LUC INSIDE CITY 5/8 or 3/4	LUC OUTSIDE CITY 5/8 or 3/4	OCWD 5/8	OCWD 3/4
1000	\$ 5.59	\$ 6.99	\$ 10.44	\$ 11.21
2000	\$ 7.42	\$ 9.28	\$ 13.19	\$ 13.96
3000	\$ 10.23	\$ 12.79	\$ 15.94	\$ 16.71
4000	\$ 13.04	\$ 16.30	\$ 18.69	\$ 19.46
5000	\$ 15.85	\$ 19.81	\$ 21.44	\$ 22.21
6000	\$ 18.46	\$ 23.08	\$ 24.19	\$ 24.96
7000	\$ 21.07	\$ 26.34	\$ 26.94	\$ 27.71
8000	\$ 23.68	\$ 29.60	\$ 29.69	\$ 30.46
9000	\$ 26.29	\$ 32.86	\$ 32.44	\$ 33.21
10000	\$ 28.90	\$ 36.13	\$ 35.19	\$ 35.96
11000	\$ 31.01	\$ 38.76	\$ 37.94	\$ 38.71
12000	\$ 33.12	\$ 41.40	\$ 40.69	\$ 41.46
13000	\$ 35.23	\$ 44.04	\$ 43.44	\$ 44.21
14000	\$ 37.34	\$ 46.68	\$ 46.19	\$ 46.96
15000	\$ 39.45	\$ 49.31	\$ 48.94	\$ 49.71
16000	\$ 41.56	\$ 51.95	\$ 51.69	\$ 52.46
17000	\$ 43.67	\$ 54.59	\$ 54.44	\$ 55.21
18000	\$ 45.78	\$ 57.23	\$ 57.19	\$ 57.96
19000	\$ 47.89	\$ 59.86	\$ 59.94	\$ 60.71
20000	\$ 50.00	\$ 62.50	\$ 62.69	\$ 63.46
21000	\$ 52.11	\$ 65.14	\$ 65.44	\$ 66.21
22000	\$ 54.22	\$ 67.78	\$ 68.19	\$ 68.96
23000	\$ 56.33	\$ 70.41	\$ 70.94	\$ 71.71
24000	\$ 58.44	\$ 73.05	\$ 73.69	\$ 74.46
25000	\$ 60.55	\$ 75.69	\$ 76.44	\$ 77.21
26000	\$ 62.66	\$ 78.33	\$ 79.19	\$ 79.96
27000	\$ 64.77	\$ 80.96	\$ 81.94	\$ 82.71
28000	\$ 66.88	\$ 83.60	\$ 84.69	\$ 85.46
29000	\$ 68.99	\$ 86.24	\$ 87.44	\$ 88.21
30000	\$ 71.10	\$ 88.88	\$ 90.19	\$ 90.96
31000	\$ 72.96	\$ 91.20	\$ 92.94	\$ 93.71
32000	\$ 74.82	\$ 93.53	\$ 95.69	\$ 96.46
33000	\$ 76.68	\$ 95.85	\$ 98.44	\$ 99.21
34000	\$ 78.54	\$ 98.18	\$ 101.19	\$ 101.96
35000	\$ 80.40	\$ 100.50	\$ 103.94	\$ 104.71
36000	\$ 82.26	\$ 102.83	\$ 106.69	\$ 107.46
37000	\$ 84.12	\$ 105.15	\$ 109.44	\$ 110.21
38000	\$ 85.98	\$ 107.48	\$ 112.19	\$ 112.96
39000	\$ 87.84	\$ 109.80	\$ 114.94	\$ 115.71
40000	\$ 89.70	\$ 112.13	\$ 117.69	\$ 118.46

+25% - OUTSIDE OF LEGRANGES CITY LIMITS
 LEGRANGE CARRIES ONE RATE FOR ALL SIZES OF METERS
 (EXAMPLE) 3/4" METER & 1" METER PAYS SAME RATE.

May 15 2005

Ky Infrastructure Authority
John Covington, III
1024 Capital Center #340
Frankfort, Ky. 40601

Dear Mr. Covington:

The Oldham County Water District has petitioned the Public Service Commission to allow us to de-annex a section of our territory in La Grange, Kentucky.

As part of their requirements we need a letter from you, as our only creditor, that the KIA has no objections to this de-annexation.

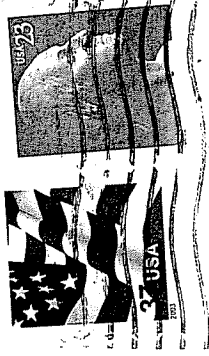
The area is on Allen Lane in LaGrange includes approximately 4 customers of the Oldham County Water District. I have enclosed for your records a copy of the order from the Oldham County Fiscal Court allowing this de-annexation that includes a detailed description of the area.

If you need additional information please let me know. We appreciate your prompt attention to this matter.

Sincerely,

DeLois Banister, Office/Accounting Manager

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Attorneys at Law
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P.O. Box 229
LaGrange, Kentucky 40031



Beth O'Donnell, Executive Director
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AUG 22 2005

PUBLIC SERVICE
COMMISSION

40602+0615-13 8007

