

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2005-00235**

In the Matter of:

APPLICATION OF MALLARD POINT
DISPOSAL SYSTEMS, INC. FOR AN
ADJUSTMENT OF RATES PURSUANT TO THE
ALTERNATIVE RATE FILING PROCEDURE
FOR SMALL UTILITIES

RECEIVED

MAR - 3 2006

PUBLIC SERVICE
COMMISSION

* * * * *

**ANSWERS BY APPLICANT MALLARD POINT DISPOSAL SYSTEMS,
INC. TO COMMISSION STAFF'S HEARING DATA REQUESTS**

* * * * *

Comes now the Applicant Mallard Point Disposal Systems, Inc. ("Mallard Point") and, in response to certain data requests made of its witnesses at the hearing held in this matter on February 22, 2006, submits the following:

1. In response to a request made of Mark S. Smith for copies of legal and accounting expenses incurred since the date of those attached in response to Request for Information No. 8 of Mallard Point's Answers to Commission Staff's First Information Request dated September 12, 2005, and to be included as part of Mallard Point's Application filed herein, please see Exhibit A attached hereto.

2. In response to a request made of Mark S. Smith for the current total number of residential and commercial customers of Mallard Point, please see Exhibit B attached hereto.

3. In response to a request made of Mark S. Smith whether the septic distribution box referred to in Exhibit 7 to Mallard Point's Answers to Staff Data Requests and its associated depreciation are a part of, and already included in, the depreciation expense for the renovation of the 50,000 GPD facility referred to in Mallard Point's pro forma depreciation expense, Mallard

Point states that it appears the depreciation for that septic distribution box has already been included in that expense, and Mallard Point withdraws its request for the same.

JAMES M. MOONEY
MOYNAHAN, IRVIN & SMITH, P.S.C.
110 NORTH MAIN STREET
NICHOLASVILLE, KENTUCKY 40356
(859) 887-1200

COUNSEL FOR APPLICANT MALLARD POINT
DISPOSAL SYSTEMS, INC.

CERTIFICATE OF SERVICE

I hereby certify that the original and eight (8) copies hereof were mailed, postage prepaid,

to the following:

Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

and that a copy of the foregoing was mailed, postage prepaid, to the following:

Honorable David Edward Spenard
Office of the Attorney General
1024 Capital Center Drive, #200
Frankfort, KY 40601-8204

on this the 2nd day of March, 2006.

COUNSEL FOR APPLICANT MALLARD POINT
DISPOSAL SYSTEMS, INC.

Stivers & Associates, PSC, CPAs

Stivers & Associates, PSC, CPAs

190 Market Street, Suite One

Lexington, KY 40507

Phone: (859)254-4427 FAX: (859)255-6198

Mallard Point Disposal Systems, Inc.
104 Teal Court
Georgetown, KY 40324

Invoice Date: February 28, 2006
Invoice Number: 00115651
Client Number: 2509 001

Professional Services Rendered as Follows:*For professional services rendered for the period ending February 28, 2006*

detail of work performed:

1.2	10/13/05	read through PSC answer	1,746.00
.9	02/21/06	gather files to take to PSC hearing	
4.0	02/22/06	PSC hearing	
.9	02/20/06	telephone conversation with James Mooney re hearing	
2.7	02/24/06	search for original estimate from 2003 rate case; review subsequent cases for additions to depreciation schedule; draft response to questions posed by PSC at hearing	

Total Invoice Amount**\$ 1,746.00****Accounts Receivable Aging**

<u>Current</u>	<u>31 - 60 Days</u>	<u>61 - 90 Days</u>	<u>91 - 120 Days</u>	<u>Over 120 Days</u>	<u>Total</u>
1,813.89	67.89	0.00	67.89	4,780.59	6,730.26

Moynahan, Irvin & Smith, P.S.C.

110 North Main Street
Nicholasville, KY 40356

Invoice submitted to:

Mallard Point Disposal Systems, Inc. 6569.000
194 Teal Court
Georgetown KY 40324

March 02, 2006

In Reference To: CPCN Case NO. 2003-00283

Invoice 23625

#

Professional Services

			<u>Hours</u>	<u>Amount</u>
2/1/2006	JMM	Telephone conference with MSmith re: hrg.; Office Conference w/MSmith re: same	0.50	75.00
2/2/2006	JMM	Draft email to MSmith re: status, notice in G-town paper; Telephone call from MSmith re: same	0.50	75.00
2/3/2006	JMM	Draft, File, Serve Witness List	0.60	90.00
2/6/2006	JMM	Telephone conference with Georgetown newspaper re: notice of hrg.; Draft email to MSmith re: same	0.25	37.50
	CSL	Instructions from Jim Mooney; call to Stephanie Conrad re: cost of ad; no Stephanie Conrad at G-town News Graphic; fax to Stephanie Furnish in bookkeeping.	0.50	30.00
2/19/2006	JMM	File Review to prepare for Hrg.	2.40	360.00
2/20/2006	JMM	File Review; Prepare for hrg.; Telephone call to MSmith, MEnderle re: same; Draft hrg. outline	6.50	975.00
2/21/2006	JMM	Telephone conference with MSmith re: hrg. testimony; File Review; Prepare for hrg.; Copy exhs.	7.00	1,050.00
2/22/2006	JMM	Travel to and from PSC for hrg.; Attend hrg.; Conference w/MSmith after; Telephone call to MEnderle re: invoice, argmts. in brief, customer list; Draft email to MSmith re: same; Telephone call from MSmith re: same; Draft Ans. to Post Hrg. Data Reqs.; Review hrg. video for brief citations	8.75	1,312.50

Moynahan, Irvin & Smith, PSC

Mallard Point Disposal Systems, Inc.

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	<u>Hours</u>	<u>Amount</u>
2/23/2006 JMM Review faxed customer list from MSmith; Review and revise Ans. to Post Hrg. Data Reqs.; Telephone call from MSmith re: Ans. to Post Hrg. Data Reqs., brief; Draft brief	6.50	975.00
2/24/2006 JMM Telephone conference with MSmith re: brief; Review email from MENDERLE re: Staff Rpt.; Scan, email same to MENDERLE; Review hrg. video for brief citations; Draft brief	5.00	750.00
2/27/2006 JMM Review fax from MENDERLE re: depreciation of splitter box; Telephone conference with MENDERLE re: same; Telephone conference with MSmith re: same; Review and revise Post Hrg. Data Req. Resp.; Draft brief	5.60	840.00
2/28/2006 JMM File Review; Review hrg. video for citations; Draft brief	4.20	630.00
For professional services rendered	48.30	\$7,200.00
Additional Charges :		
2/15/2006 Fax		0.40
2/28/2006 Postage		2.67
Copying cost		25.40
Total costs		\$28.47
Total amount of this bill		\$7,228.47
Previous balance		\$187.50
Balance due		\$7,415.97

Moynahan, Irvin & Smith, P.S.C.

110 North Main Street
Nicholasville, KY 40356

Invoice submitted to:

Mallard Point Disposal Systems, Inc. 6569.000
194 Teal Court
Georgetown KY 40324

February 03, 2006

In Reference To: CPCN Case NO. 2003-00283

Invoice 23358

#

Professional Services

	<u>Hours</u>	<u>Amount</u>
1/18/2006 JMM Telephone conference w/Mark	0.25	31.25
1/19/2006 JMM Call to JRGoff	0.10	12.50
1/20/2006 JMM Telephone conference w/Mark re: PSC Ord.	0.25	31.25
1/26/2006 JMM Review PSC Ord. re: hrg.; Draft email to MSmith re: same; Telephone call from MSmith re: same	0.25	31.25
1/28/2006 JMM Review email from MENDERLE re: hrg.; Draft email to MENDERLE re: same	0.25	31.25
1/31/2006 JMM Letter to G-town newspaper re: notice; Draft email to MSmith re: same, hrg.	0.40	50.00
	<hr/>	<hr/>
For professional services rendered	1.50	\$187.50
	<hr/>	<hr/>
Balance due		\$187.50
		<hr/> <hr/>

LAW OFFICES

Mooney Mooney & Mooney

208 South Limestone Street
Lexington, KY 40508-2502

Eugene F. Mooney
James M. Mooney
Matthew L. Mooney

Telephone
(859) 259-2701
Telefax
(859) 259-2703

December 1, 2005

Mallard Point Disposal Systems, Inc.
104 Teal Court
Georgetown, KY 40324

For the period

File #: 000077-001
Inv #: 7795
to Dec 01/05

Attention: Mr. Mark Smith**RE:** CPCN Case No. 2003-00283; ARF Case No. 2003-00284**Services**

<u>Date</u>	<u>Description</u>	<u>Emp'ee</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Nov-14-05	Review Patrick coments; Review file/record; Draft Mot. to Strike; Draft email to MSmith	JMM	1.75	\$150.00	262.50
Nov-15-05	Telephone call from MSmith re: Mot. to Strike; Review & revise same; File; Serve	JMM	0.50	\$150.00	75.00
	Total Services		<u>2.25</u>		<u>\$337.50</u>

Disbursements

Nov-30-05	Copies 42 @ 0.25				10.50
	Total Disbursements				<u>\$10.50</u>

Totals**Total Services & Disbursements****\$348.00**

Previous Balance

\$9,837.90

Previous Payments

\$0.00

Balance Due Now**\$10,185.90**

Total Services & Disbursements	\$1,881.50
Previous Balance	\$10,456.40
Previous Payments	\$2,500.00
Balance Due Now	\$9,837.90

LAW OFFICES

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208 South Limestone Street
Lexington, KY 40508-2502

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Telephone
(859) 259-2701
Telefax
(859) 259-2703

November 1, 2005

Mallard Point Disposal Systems, Inc.
104 Teal Court
Georgetown, KY 40324

File #: 000077-001
Inv #: 7762
For the period to Nov 01/05

Attention: Mr. Mark Smith

RE: CPCN Case No. 2003-00283; ARF Case No. 2003-00284

Services

<u>Date</u>	<u>Description</u>	<u>Emp'ee</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Oct-04-05	Telephone call from MSmith re: ext. of Staff Rpt. time	JMM	0.25	\$150.00	37.50
Oct-13-05	Review PSC Rpt.; Telephone call to MENDERLE, MSmith; Draft Resp.	JMM	3.25	\$150.00	487.50
Oct-14-05	Telephone call to MSmith, MENDERLE; Review & revise Resp. to PSC Rpt.; Draft email to MENDERLE, MSmith	JMM	4.50	\$150.00	675.00
Oct-17-05	Review & revise Resp. to PSC Rpt.; Telephone call to MSmith, MENDERLE	JMM	4.00	\$150.00	600.00
Oct-18-05	re: same; File; Serve Telephone call from MSmith re: AG Resp. to PSC Rpt.	JMM	0.25	\$150.00	37.50
Total Services			12.25		\$1,837.50

Disbursements

Oct-31-05	Copies 176 @ 0.25				44.00
Total Disbursements					\$44.00

Totals

	Total Services	26.15	\$3,922.50
	Disbursements		
Sep-13-05	Postage		11.85
	Reimbursed Expenses - Index tabs		113.82
Sep-15-05	Postage		1.11
Sep-16-05	Postage		6.02
Sep-26-05	Stationery/Supplies		38.87
Sep-30-05	Copies 1204 @ 0.25		301.00
	Postage		3.95
	Total Disbursements		\$476.62
	Totals		
	Total Services & Disbursements		\$4,399.12
	Previous Balance		\$6,057.28
	Previous Payments		\$0.00
	Balance Due Now		\$10,456.40

LAW OFFICES

Mooney Mooney & Mooney

208 South Limestone Street
Lexington, KY 40508-2502

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Telephone
(859) 259-2701
Telefax
(859) 259-2703

October 1, 2005

Mallard Point Disposal Systems, Inc.
104 Teal Court
Georgetown, KY 40324

File #: 000077-001
Inv #: 7706
For the period to Oct 01/05

Attention: Mr. Mark Smith

RE: CPCN Case No. 2003-00283; ARF Case No. 2003-00284

Services

<u>Date</u>	<u>Description</u>	<u>Emp'ee</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Sep-07-05	Draft Ans. to AG Doc. Req.	JMM	1.40	\$150.00	210.00
Sep-08-05	Telephone call to MSmith, MEnderle; Draft Ans. to Data Reqs.	JMM	2.25	\$150.00	337.50
Sep-09-05	Draft Ans. to Data Reqs.; Conference - Office w/MSmith, MEnderle	JMM	10.00	\$150.00	1,500.00
Sep-11-05	Draft Ans. to Data Reqs.	JMM	0.75	\$150.00	112.50
Sep-12-05	Conference - Office w/MSmith re: Data Reqs.; Telephone call to MEnderle re: same; Review & revise Ans. to Data Reqs.; File; Serve	JMM	8.50	\$150.00	1,275.00
Sep-13-05	Telephone call from MSmith re: data req. filing, etc.	JMM	0.25	\$150.00	37.50
Sep-14-05	Review email from MEnderle re: Staff Suppl. Ans.; Draft email to MSmith, MEnderle re: same; Review email from MEnderle w/suppl. info.; Telephone call from MSmith re: same; Draft Suppl. Ans.	JMM	0.75	\$150.00	112.50
Sep-15-05	Draft Suppl. Ans. to Staff Data Reqs.; Telephone call to MSmith re: same; Letter to MFrost	JMM	0.75	\$150.00	112.50
Sep-16-05	Organize files/documents for Suppl. Ans.; File; Serve	JMM	1.00	\$150.00	150.00
Sep-21-05	Review Patrick Mot. to Reconsider; Telephone call to MSmith re: same; Scan email Mot. to MSmith	JMM	0.50	\$150.00	75.00

Total Disbursements	<u>\$28.05</u>
Totals	
Total Services & Disbursements	<u>\$1,550.55</u>
Previous Balance	\$4,506.73
Previous Payments	\$0.00
Balance Due Now	<u>\$6,057.28</u>

Mallard Point Disposal Systems, Inc. Transaction List by Customer

1 ANCHORAGE100	56 BROADBILL100	111 GREENWING103
2 ANCHORAGE101	57 BROADBILL105	112 GREENWING105
3 ANCHORAGE102	58 BROADBILL107	113 GREENWING106
4 ANCHORAGE103	59 BUFFLEHEAD100	114 GREENWING110
5 ANCHORAGE105	60 BUFFLEHEAD101	115 GREENWING112
6 ANCHORAGE106	61 BUFFLEHEAD103	116 GREENWING113
7 ANCHORAGE107	62 BUFFLEHEAD104	117 GREENWING116
8 ANCHORAGE108	63 BUFFLEHEAD105	118 GREENWING117
9 BAYSIDE102	64 BUFFLEHEAD107	119 GREENWING118
10 BAYSIDE103	65 CANVASBACK101	120 GREENWING119
11 BAYSIDE104	66 CANVASBACK103	121 GREENWING120
12 BAYSIDE105	67 CANVASBACK105	122 GREENWING122
13 BAYSIDE106	68 CANVASBACK106	123 GREENWING123
14 BLACKBERRY100	69 CANVASBACK107	124 GREENWING124
15 BLACKBERRY102	70 CANVASBACK108	125 GREENWING126
16 BLACKBERRY103	71 CANVASBACK109	126 GREENWING127
17 BLACKBERRY104	72 CANVASBACK110	127 GREENWING128
18 BLACKBERRY106	73 CANVASBACK111	128 GREENWING130
19 BLACKBERRY109	74 CANVASBACK112	129 GREENWING132
20 BLACKBERRY110	75 CANVASBACK115	130 GREENWING134
21 BLACKBERRY111	76 COVESIDE102	131 GREENWING135
22 BLACKBERRY112	77 COVESIDE105	132 GREENWING136
23 BLACKBERRY115	78 DRAKE100	133 GREENWING139
24 BLACKBERRY117	79 DRAKE101	134 GREENWING140
25 BLACKBERRY118	80 DRAKE103	135 GREENWING142
26 BLACKBERRY119	81 DRAKE105	136 GREENWING143
27 BLACKBERRY121	82 DRAKE109	137 GREENWING144
28 BLACKDUCK105	83 DRAKE138	138 GREENWING145
29 BLUEBILL101	84 DRAKE140	139 HARBORSIDE101
30 BLUEBILL102	85 DRAKE145	140 HARBORSIDE102
31 BLUEBILL103	86 DRAKE161	141 HARBORSIDE103
32 BLUEBILL104	87 DRAKE166	142 HARBORSIDE105
33 BLUEBILL106	88 DRAKE168	143 HARBORSIDE109
34 BLUEBILL108	89 EIDER100	144 HARBORSIDE110
35 BLUEBILL109	90 EIDER101	145 HARBORSIDE111
36 BLUEBILL112	91 EIDER102	146 HARBORSIDE113
37 BLUEBILL113	92 EIDER103	147 HARBORSIDE117
38 BLUEBILL115	93 EIDER104	148 HARBORSIDE119
39 BLUEBILL118	94 EIDER105	149 HARBORSIDE121
40 BLUEBILL122	95 EIDER106	150 HARBORSIDE122
41 BLUEBILL123	96 EIDER108	151 HARBORSIDE123
42 BLUEWING102	97 EIDER109	152 HARBORSIDE124
43 BLUEWING105	98 EIDER110	153 HARBORSIDE125
44 BLUEWING108	99 EIDER112	154 HVDR191
45 BRANT102	100 EIDER113	155 HVDR193
46 BRANT103	101 EIDER114	156 HVDR194
47 BRANT104	102 EIDER115	157 HVDR195
48 BRANT105	103 FALCON100	158 HVDR198
49 BRANT106	104 FALCON105	159 HVDR199
50 BRANT107	105 FALCON106	160 HVDR200
51 BRANT109	106 GOLDENEYE100	161 HVDR201
52 BRANT110	107 GOLDENEYE102	162 HVDR203
53 BRANT111	108 GOLDENEYE105	163 HVDR204
54 BRANT112	109 GOLDENEYE110	164 HVDR205
55 BRANT113	110 GREENWING100	165 HVDR206

Mallard Point Disposal Systems, Inc. Transaction List by Customer

166 HVDR208	221 LAKESIDE112	276 PINTAIL107
167 HVDR210	222 LAKESIDE113	277 PINTAIL108
168 HVDR212	223 LAKESIDE203	278 PINTAIL109
169 HVDR228	224 LAKESIDE212	279 PINTAIL111
170 HVDR230	225 LAKESIDE223	280 PUFFIN100
171 LAKESHORECL199	226 LAKESIDE225	281 PUFFIN101
172 LAKESHORECL203	227 LAKESIDE230	282 PUFFIN102
173 LAKESHORECL205	228 LAKESIDE231	283 PUFFIN103
174 LAKESHORECL206	229 LAKESIDE235	284 PUFFIN104
175 LAKESHORECL207	230 LAKESIDE237	285 PUFFIN105
176 LAKESHORECL300	231 MERGANSER100	286 PUFFIN107
177 LAKESHORECL301	232 MERGANSER101	287 QUANDY100
178 LAKESHORECL302	233 MERGANSER105	288 QUANDY103
179 LAKESHORECT100	234 MERGANSER107	289 QUANDY104
180 LAKESHORECT102	235 MERGANSER111	290 REDWING102
181 LAKESHORECT103	236 MERGANSER115	291 REDWING104
182 LAKESHORECT104	237 MERGANSER116	292 REDWING106
183 LAKESHORECT105	238 MERGANSER118	293 REDWING107
184 LAKESHORECT106	239 MERGANSER119	294 RINGBILL106
185 LAKESHORECT107	240 MERGANSER120	295 RINGBILL107
186 LAKESHOREDR101	241 MERGANSER122	296 RINGBILL108
187 LAKESHOREDR200	242 MERGANSER123	297 SCOTT CO SCHOOL
188 LAKESHOREDR201	243 MERGANSER125	298 SHELDRAKE100
189 LAKESHOREDR202	244 MP BAPTIST CHURCH	299 SHELDRAKE102
190 LAKESHOREDR203	245 MPCT100	300 SHELDRAKE103
191 LAKESHOREDR204	246 MPCT101	301 SHELDRAKE104
192 LAKESHOREDR205	247 MPCT102	302 SHELDRAKE105
193 LAKESHOREDR206	248 MPCT103	303 SHELDRAKE107
194 LAKESHOREDR208	249 MPCT106	304 SHELDRAKE108
195 LAKESHOREDR210	250 MPCT108	305 SHELDRAKE110
196 LAKESHOREDR211	251 MPCT109	306 SHELDRAKE112
197 LAKESHOREDR212	252 MPCT110	307 SHELDRAKE116
198 LAKESHOREDR213	253 MPCT111	308 SHELDRAKE118
199 LAKESHOREDR214	254 MPCT112	309 SHOVELER107
200 LAKESHOREDR215	255 MPCT114	310 SHOVELER109
201 LAKESHOREDR216	256 MPCT118	311 SHOVELER110
202 LAKESHOREDR217	257 MPCT200	312 SHOVELER112
203 LAKESHOREDR218	258 MPCT206	313 SHOVELER113
204 LAKESHOREDR219	259 MPCT210	314 SHOVELER115
205 LAKESHOREDR224	260 MPCT212	315 SPOONBILL104
206 LAKESHOREDR227	261 MPDR196	316 SPOONBILL106
207 LAKESHOREDR228	262 MPDR201	317 STARBOARD102
208 LAKESHOREDR229	263 MPDR204	318 STARBOARD103
209 LAKESIDE100	264 MPDR205	319 STARBOARD104
210 LAKESIDE101	265 MPDR206	320 STARBOARD105
211 LAKESIDE102	266 MPDR207	321 SUMMERIDGE100
212 LAKESIDE103	267 MPDR209	322 SUMMERIDGE102
213 LAKESIDE104	268 MPDR211	323 SUMMERIDGE103
214 LAKESIDE105	269 MPDR406	324 SUMMERIDGE104
215 LAKESIDE106	270 MPDR502	325 SUMMERIDGE106
216 LAKESIDE107	271 MPDR505	326 SUMMERIDGE107
217 LAKESIDE108	272 PINTAIL100	327 SUMMERIDGE110
218 LAKESIDE109	273 PINTAIL102	328 SUMMERIDGE111
219 LAKESIDE110	274 PINTAIL104	329 SUMMERIDGE112
220 LAKESIDE111	275 PINTAIL106	330 SUMMERIDGE114

**Mallard Point Disposal Systems, Inc.
Transaction List by Customer**

331 SUMMERIDGE115	386 WOODDUCK614
332 SUMMERIDGE118	387 WOODDUCK615
333 SUMMERIDGE119	388 WOODDUCK617
334 SUMMERIDGE120	389 WOODDUCK618
335 SUMMERIDGE121	390 WOODDUCK619
336 SUMMERIDGE124	391 WOODDUCK620
337 SUMMERIDGE125	392 WOODDUCK621
338 SUMMERIDGE126	393 WOODDUCK622
339 TEAL100	394 WOODDUCK623
340 TEAL102	395 WOODDUCK624
341 TEAL105	396 WOODDUCK625
342 TEAL106	397 WOODDUCK626
343 TEAL108	
344 TEAL109	
345 TEAL110	
346 TEAL111	
347 WHISTLER103	
348 WHISTLER105	
349 WHISTLER106	
350 WHISTLER109	
351 WHITEWING101	
352 WHITEWING104	
353 WHITEWING108	
354 WHITEWING109	
355 WIDGEON101	
356 WIDGEON105	
357 WIDGEON110	
358 WIDGEON112	
359 WIDGEON201	
360 WIDGEON203	
361 WIDGEON206	
362 WIDGEON208	
363 WOODDUCK200	
364 WOODDUCK204	
365 WOODDUCK300	
366 WOODDUCK303	
367 WOODDUCK305	
368 WOODDUCK307	
369 WOODDUCK309	
370 WOODDUCK400	
371 WOODDUCK401	
372 WOODDUCK403	
373 WOODDUCK404	
374 WOODDUCK405	
375 WOODDUCK409	
376 WOODDUCK501	
377 WOODDUCK503	
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