

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF FARMDALE DEVELOPMENT)
CORPORATION FOR A CERTIFICATE OF) CASE NO. 2006-00028
CONVENIENCE AND NECESSITY, AUTHORITY)
TO MAKE REPAIRS AND SURCHARGE FOR SAME)

AMENDED LIST OF WITNESSES AND IDENTIFICATION OF ISSUES

Pursuant to the February 26, 2007 Order issued by the Public Service Commission in the above styled action, comes Farmdale Development Corporation, by counsel, and hereby identifies the individuals that it may call as witnesses to testify on its behalf in the hearing in the above-styled matter and identifies the issues to be addressed at the hearing:

I. WITNESS LIST:

- 1) Carroll F. Cogan;
- 2) Lawrence W. Smither;
- 3) Martin G. Cogan;
- 4) Pat Logsdon;
- 5) Thomas Elliot;
- 6) Chris Ochsner;
- 7) Jack Kaninberg;
- 8) Jess Thompson;
- 9) Preston O. Robards;

II. IDENTIFICATION OF ISSUES:

As stated in the Comments of Farmdale Development Corporation, the following are the issues to be presented to the Commission.

- 1) Farmdale's application for rate adjustment was submitted pursuant to 807 KAR 5:076, the regulation providing an alternative rate adjustment procedure for small utilities.

This regulation“is intended to minimize the need for formal hearings, to reduce filing requirements, and in many cases to shorten the time period between application and commission order.” Commission staff has not reviewed this application consistent with the intent of this regulation.

2. The Commission should grant the requested surcharge.
3. The Commission should approve the requested rate of \$34.49 instead of the rate of \$27.23 recommended by staff.
4. The Commission should approve the repairs to the Farmdale wastewater collection system based on the detailed quote of Murphy’s Excavating in the amount of \$112,560.
5. In the event the Commission does not approve the repairs detailed in the quote submitted by Murphy’s Excavating, it should approve the videotaping of the collection system, the cleaning and cutting of the roots in the system and a root treatment, as set forth in the quotes of Martin’s Pipeline Inspection in the amount of \$26,402.00 or the quote of Pipe Eyes, LLC in the amount of \$32,606.47.
6. Because the revenue received by Farmdale Development Corporation is insufficient to pay for the cost of the necessary repairs to the Farmdale wastewater treatment plant and collection system, the Commission should approve a three (3) year surcharge to recover these costs.
7. The Commission should approve a cost of \$6,815 for the replacement of the chlorine tank and the standby blower motor assembly.
8. The Commission should approve a cost of \$30,425 for the cost of the

replacement of the remote lift station.

9. The proposed costs for the cleaning and pumping of the lagoon, small plant maintenance and supervision are reasonable and should be approved by the Commission.

10. It is unreasonable to require Farmdale Development Corporation to attempt to finance the cost of the needed repairs over more than a five (5) year period.

11. The Commission should approve the owner/management fee in the amount of \$9,600.

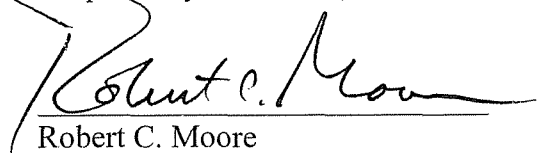
12. The Commission should approve the \$825 paid to Martin & Associates for review and preparation of the Monthly Discharge Monitoring Reports submitted to the Kentucky Division of Water.

13. The accounting and attorneys fees should be amortized over the proper length of time.

14. Lawrence W. Smither is not an affiliated entity with respect to Farmdale Development Corporation.

15. The Commission should approve the cost of the repairs as proposed by the applicant.

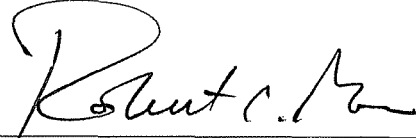
Respectfully Submitted,



Robert C. Moore
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by first class mail, postage prepaid, on David Edward Spenard, Assistant Attorney General, 1024 Capital Center Drive, Suite 200, Frankfort, Ky., 40601-8204, Beverly J. Hunt, 304 Peachtree Road, Frankfort, Kentucky 40601-8141, Kenny and Marilyn Glass, 223 Briarwood Drive, Frankfort, Kentucky 40601 and Mary Pennington, 210 Cherry Lane, Frankfort, Kentucky 40601, on this the 13th day of March, 2007.

A handwritten signature in black ink, appearing to read "Robert C. Moore", written over a horizontal line.

Robert C. Moore