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Commonwealth of Kentucky  
**Public Service Commission**  
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Gregory Coker  
Commissioner

April 27, 2006

James Lee Mudd  
Manager  
Marion County Water District  
P. O. Box 528  
Lebanon, KY 40033

RE: Case No. 2006-00037

Please see enclosed data request from Commission Staff in the above case.

If you need further assistance, please contact Jessamyn Thompson at (502) 564-3940 ext. 278.

Sincerely,

A handwritten signature in black ink, appearing to read "Beth O'Donnell".

Beth O'Donnell  
Executive Director

BOD/sh  
Enclosure

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF MARION COUNTY )  
WATER DISTRICT TO REVISE CERTAIN ) CASE NO.  
NON-RECURRING CHARGES ) 2006-00037

COMMISSION STAFF'S FIRST INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO MARION COUNTY WATER DISTRICT

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Marion County Water District ("Marion County") file with the Commission the original and 5 copies of the following information within 20 days of the date of this request, with a copy to all parties of record. Each copy of the information requested shall be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible.

1. Refer to the last page of the application entitled "Rate Charge for Labor."
  - a. Explain what the 1.5 factor represents.
  - b. If the 1.5 factor represents time and a half, explain why it is used in determining the hourly rate during regular hours and why \$33.00 is used as the hourly rate after hours.
  - c. Explain how the percentages for payroll taxes, retirement, and workers' compensation were derived.

2. Refer to the cost justification pages for the Connection/Turn-on Charge After Hours, the Reconnection Fee After Hours, and the Service Call/Investigation After Hours.

a. Explain why the labor for clerical and office expense is higher than during regular hours. Does office staff come in after hours?

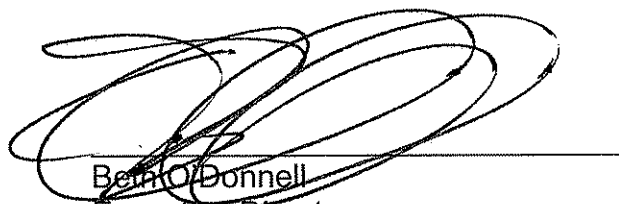
b. Explain why the labor for clerical and office expense is higher for the Reconnection Fee After Hours than it is for the Connection/Turn-on Charge After Hours and the Service Call/Investigation After Hours.

3. Refer to the cost justification page for the Meter Test Request and explain why the total labor cost is \$66.00 for 2 hours at \$22.00 per hour.

4. Refer to the cost justification for the Returned Check Charge.

a. Explain what clerical and office labor is involved in processing a returned check.

b. Does the District's bank charge a fee for returned checks?



Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, Kentucky 40602

DATED April 27, 2006

cc: All Parties

Case No. 2006-00037