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Gregory Coker
Commissioner

Karl D. Bradley, Jr.
8845 Leatherwood Road
Salt Lick, KY 40371

July 10, 2006

RE: Case No. 2006-00163

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

If you need further assistance, please contact Linda Mattox at (502) 564-3940 ext. 407.

Sincerely,

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

Beth O'Donnell
Executive Director

BOD/jc
Enclosure

Karl D. Bradley, Jr.
8845 Leatherwood Road
Salt Lick, KY 40371

Honorable Earl Rogers III
Attorney at Law
Campbell & Rogers
154 Flemingsburg Road
Morehead, KY 40351

Jeanette Walton
Manager
Bath County Water District
21 Church Street
P. O. Box 369
Salt Lick, KY 40371

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KARL DAVID BRADLEY, JR.)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2006-00163
)	
BATH COUNTY WATER DISTRICT)	
)	
DEFENDANT)	

FIRST DATA REQUEST OF COMMISSION STAFF TO
BATH COUNTY WATER DISTRICT

Bath County Water District ("Bath County") is requested, pursuant to 807 KAR 5:001, to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The requested information is due 20 days from the date of this request. 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 person 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. Where information has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

1. Provide a detailed map of Bath County's water lines with clearly labeled line sizes and distances.

2. Provide maps (preferably USGS 7.5-minute series topographic maps) highlighting the 3 areas for which Complainant is requesting service, Complainant's property, any existing waterlines, pump stations, tanks, etc. located in the vicinity of these 3 areas, including facilities from the city of Frenchburg.

3. Provide the potential number of customers in the areas named in the Complainant's petition.

4. What is the estimated cost for Bath County to provide service to Complainant?

5. Provide the feasibility study and/or report that was ordered in Case No. 1989-00154,¹ including all available updates to the report as well as any new information that would change the outcome of this study.

6. Discuss the feasibility of extending water service to Complainant, including the length of extension required and the cost of that extension.

7. Provide the following information concerning the Leatherwood Extension Project referenced in Complainant's petition.

a. What is the status of the project?

b. What is the cost of the project?

c. Does Bath County have the financing available to complete the project or is Bath County in the process of obtaining financing?

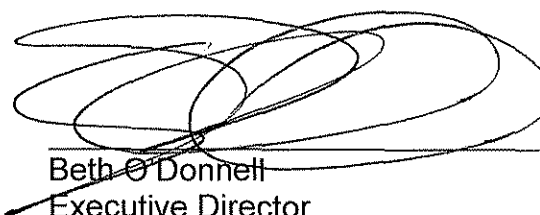
d. Would Bath County be able to extend water service to Complainant upon the completion of the project?

¹ Case No. 1989-00154, Application For Commission Approval to Establish a Water District in Menifee County, Kentucky.

8. Is there an understanding between Bath County and the Frenchburg Water Department regarding which party would be responsible to extend water service to the area referenced in Complainant's petition? If yes, provide details of this understanding, including any written agreements between Frenchburg Water Department and Bath County.

9. In addition to the agreements referenced above, provide details of all of Bath County's plans to serve the area referenced in Complainant's petition.

10. Is Bath County aware of any entity's plans to serve the area? If yes, provide detailed descriptions of these plans.



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

DATED: July 10, 2006

cc: Parties of Record