

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KENTUCKY DAM VILLAGE STATE RESORT	)	
PARK, KENTUCKY DEPARTMENT OF PARKS,	)	CASE NO.
COMMERCE CABINET	)	2006-00365
	)	
COMPLAINANT	)	
	)	
V.	)	
	)	
NORTH MARSHALL WATER DISTRICT	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S SECOND INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
ON KENTUCKY DAM VILLAGE

Kentucky Dam Village ("KDV"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before May 15, 2007. Each copy of the data requested should 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 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.

Each response shall be under oath or, for representatives of a public or private corporation, a partnership, an association or a governmental agency, be accompanied

by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KDV shall make timely amendment to any prior response if it obtains information upon the basis of which it knows that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which KDV fails to furnish all or part of the requested information, KDV shall provide a written explanation of the specific grounds for its failure to furnish.

Careful attention shall be given to copied material to ensure its legibility. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be provided for total company operations and jurisdictional operations, separately.

1. North Marshall Water District's ("North Marshall") tariff at II.C.4.b) provides on Sheet 11 that "Water service will be billed bimonthly with bills mailed on or about the 20<sup>th</sup> of each even numbered month." On what date does KDV ordinarily receive its bill from North Marshall?

2. Describe in detail the process used by KDV to obtain approval for an expenditure such as the payment of the utility bill to North Marshall. Include the amount of time ordinarily involved in each of the steps in the process; the dates of the month that each step is usually commenced and completed; and the individuals and entities involved in each of the steps.

3. Describe the process used in sending payment for a utility bill. Include information on what agency originally drafts the check and whether the check is sent directly from that agency to the utility or whether it is sent to another location first, such as KDV or the Department of Parks.

4. On what dates were the check for payment to North Marshall approved and the check issued?

5. Provide a copy of both sides of the check sent by KDV for payment to North Marshall.

6. If available, provide a copy of the envelope sent by North Marshall to KDV providing notice of KDV's alleged late payment. Include, to the extent available, a copy of any cover letter or document or other item accompanying any late notice.

7. Identify all occasions that KDV has been assessed a late payment and paid the penalty pursuant to North Marshall's tariff.

8. To the extent that KDV has paid a late payment penalty that was assessed according to the terms of the tariff, describe the reasons KDV did not previously object to paying the late payment penalty according to the terms of the tariff.



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

DATED: May 4, 2007

cc: Parties of Record