

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

March 14, 2008

RECEIVED

Ms. Beth O'Donnell
Executive Director - Kentucky Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40620-0615

MAR 17 2008

PUBLIC SERVICE
COMMISSION

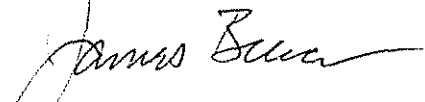
**SUBJECT: Response to Data Request No. 1
Case 2007-00461 - Tariff for Master Metering of Mobile Home Communities**

Dear Director O'Donnell,

Enclosed please find an original and 7 copies of our response to Data Request No. 1, for the above referenced tariff. The request from the Commission was dated February 18, 2008, and a subsequent order allowed a time extension until March 17, 2008. We have also filed a copy with Mr. Spenard, with the Attorney's General office.

If you have any questions, please do not hesitate to call me or our attorney, Mr. David Wilson II (Phone: 270-351-4404).

Sincerely,



Jim Bruce, General Manager

Cf; Mr. David Wilson II, HCWD1 Attorney
Mr. David Spenard, esq, Assistant Attorney General, Consumer Protection Division

Encl.

VERIFICATION

The undersigned, Mr. James S. Bruce, General Manager of the Hardin County Water District No.1, hereby verifies that he has personal knowledge of the matters set forth in the enclosed response to Data Request No. 1, Case No. 2007-00461, in the matter of a proposed tariff allowing the use of master meters in mobile home communities, and the advanced personal testimony filed with the original tariff on October 15, 2007, and that he is duly designated by the Board of Commissioners of the Hardin County Water District No. 1 to sign and submit this information its behalf.

HARDIN COUNTY WATER DISTRICT No. 1

By James S. Bruce
JAMES S. BRUCE, GENERAL MANAGER

CERTIFICATION OF SERVICE

The undersigned, Mr. David T. Wilson II, attorney for the Hardin County Water District No. 1, hereby verifies that the foregoing was served on Ms. Beth O'Donnell, Executive Director, Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, KY. 40601-8204 and on the Attorney General, Mr. Jack Conway, ATTENTION Mr. David Spenard, esq., 1024 Capitol Center Drive, Frankfort, KY, 40601 on this 14th Day of March , 2008

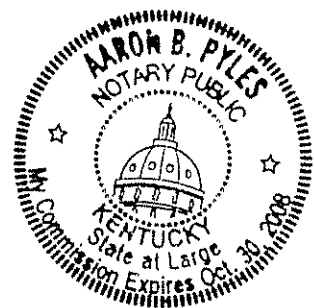
By David T. Wilson II
Mr. David T. Wilson II, ESQ.
Attorney for Hardin County Water District No. 1

STATE OF KENTUCKY
COUNTY OF HARDIN

I, the undersigned, a Notary Public, do hereby certify that on this 14th day of March 2008, personally appeared before me, James S. Bruce and David T. Wilson II, who being by me first sworn, subscribed to and acknowledged that they both represent the Hardin County Water District No. 1, a Kentucky Corporation, that they have signed the foregoing document as General Manager and Attorney of the Corporation.

Aaron B. Pyles
NOTARY PUBLIC, STATE OF KENTUCKY

My Commission Expires; October 30, 2008



1. Refer to the Advance Prepared Testimony of Jim Bruce. Provide a signed affidavit of Mr. Bruce attesting to the truth and accuracy of the Advance Prepared Testimony. Alternatively, Hardin County may incorporate that testimony into its response to this item.

ANSWER: The affidavit requested has been provided with this response and filing

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

VERIFICATION

The undersigned, Mr. James S. Bruce, General Manager of the Hardin County Water District No. 1, hereby verifies that he has personal knowledge of the matters set forth in the enclosed response to Data Request No. 1, Case No. 2007-00461, in the matter of a proposed tariff allowing the use of master meters in mobile home communities, and the advanced personal testimony filed with the original tariff on October 15, 2007, and that he is duly designated by the Board of Commissioners of the Hardin County Water District No. 1 to sign and submit this information its behalf.

HARDIN COUNTY WATER DISTRICT No. 1

By *James S. Bruce*
JAMES S. BRUCE, GENERAL MANAGER

CERTIFICATION OF SERVICE

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By *David T. Wilson II*
Mr. David T. Wilson II, ESQ.
Attorney for Hardin County Water District No. 1

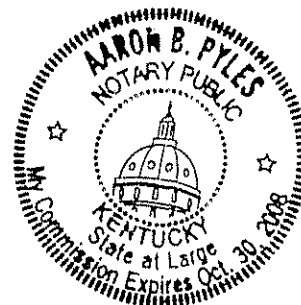
STATE OF KENTUCKY
COUNTY OF HARDIN

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Aaron B. Pyles
NOTARY PUBLIC, STATE OF KENTUCKY

My Commission Expires;

October 30, 2008



2. Refer to the proposed tariff, Sheet 7 B-2, No. 4, Policy Regarding Deposits.
 - a. State whether these proposed provisions supplement Hardin County's current deposit policies.
 - b. If the proposed deposit provisions supplement the current policies, state which of the existing policies, if any, would not apply to the proposed master metering tariff.

ANSWER: a. Yes.

b. Sheet 3-5 A & B (If required by the Commission, the District would agree to modify these sections as well to distinguish which deposit policies or methods apply to which customer classes).

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

3. Refer to the proposed tariff, Sheet 7B-3, No. 5, Notice of Service Interruption, paragraph (d).
 - a. State whether Hardin County would be willing to amend the language of the proposed tariff to require the District to publish notice of a disconnection.
 - b. If the district finds this to be unreasonable, state why.

ANSWER: a. Yes. However, the District did discuss and consider this with its Board and legal counsel. We were concerned that publishing information in newspaper which disclosed information about a customer (MHC owner / landlord) not paying a bill, or being behind in payment, may violate a privacy or consumer credit protection statutes. It may be the notice could only refer to address where service may be interrupted, without divulging account holders name or payment information.

b. N/A

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

4. Refer to the proposed tariff, Sheet 7B-4, No. 7, Selective Termination, paragraph (b). Provide the average cost for a plumber's certification letter and a laboratory test for contaminants.

ANSWER: We have contacted one local licensed plumber, who gave us an amount of \$200 to provide this type of certification. letter. Another licensed plumber told us he would not charge anything for this type of letter. Our current laboratory charges \$35 for each Bac-T test for a sample provided by the District. Our proposed tariff states that these charges could be reimbursed to the District, or paid directly by the owner.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

5. Refer to the proposed tariff, Sheet 7B-8, Private Property Metering Agreement, No. 6. State the legal authority or argument permitting utilities and customers to waive Commission regulations.

ANSWER: A water district alone has no authority to deviate or waive Commission regulations. Any deviation from an existing regulation may be granted by a deviation as provided under KAR 5:011, Section 14. The District's proposed tariff may require a deviation from current regulations, due to special circumstances, which it would be dependent on Commission approval before the tariff could be implemented or approved.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

6. Identify the name and mailing address of each of the manufactured housing communities (“MHC”) within your service area.

ANSWER: The requested information follows this sheet and is attached. (As the current MHC owners are not current customers of the District, it is difficult to keep up with ownership changes and addresses, but the information provided is the latest address the District is aware of).

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

<u>Name</u>	<u>Mailing Address</u>
Brentwood Estates	369 Elm
Golden Rainbow	360 Hill
Combs Mobile Home Park	Combs Lane
2600 Knox	2600 Knox
Country Lane Mobile Home Park	133 Country Lane
2010 Hill	2010 Hill
Rogersville MHP	102 Pearl St., 224 Graham St., & Allen St.
Raisor MHP	1087 Hill
Oak Hill MHP	1349 Hill
Paradise MHP	1445 Hill
455 Rogersville	455 Rogersville
Brack Enterprises	871 Wilson
Woodland MHP	1501 Dixie
1343 Dixie	1343 Dixie
245 Globe	245 Globe
Dixie MHP	1740 Dixie
Park Valley Community	1674 Dixie
1170 Waterfield	1170 Waterfield
D & J Rentals	652 Millcreek
Southland Mobile Home Park	402 Southland Drive
Homestead MHP	406 North St.
Yarwood MHP	1190 Dixie
Lynch's MHP	1607, 1645 & 1659 Wilson
Parkside Manor MHP	1855 Wilson
Duvall MHP	1255 Wilson
Masden MHP	137 Masden

7. For each MHC, identify the amount of water delivered through the master meter and the amount of water billed to all accounts within the MHC for each of the last 12 months.

ANSWER: The requested information is attached.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

8. Provide every master meter test result for each of the MHCs since January 1, 2007.

ANSWER: Requested information is attached. (Have provided test result of each MHC master meter, regardless of test date).

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

Master Meter Test Information									
Name	Address	Mtr.#	Installed	L/M/H	Overall	Test Date	Size (in.)	Parcel	
Brack Enterprises	871 Wilson	31634753	7/31/2006	99-101-100	100.5	6/23/2006	2	5-7390	
1343 Dixie	1343 Dixie	88542921	12/17/1999	99-100-99	100.5	11/16/1999	1	6-8934	
Woodland MHP	1501 Dixie	87630161	10/7/2005	98-100-99.3	99.65	7/9/1995	1	6-8848	
245 Globe	245 Globe	56018261	1/6/2000	new	new	1/6/2000	5/8x3/4	7-8989	
Dixie MHP	1740 Dixie	56889589	2/27/2007	99-101-100	100.5	2/26/2007	1-1/2	7-0510	
Park Valley Comm	1674 Dixie	31634750	3/5/2007	98-101-101	101	1/5/2007	2	7-1019	
616 Millcreek	616 Millcreek	34336943	2/19/2004	100-99-99.5	100.25	3/12/2002	3/4	7-1548	
D & J Rentals	652 Millcreek	91967624	2/19/2004	101-101-99.5	100.25	12/29/2003	5/8x3/4	7-1771	
Southland	402 Southland	88533002	6/10/2005	100.7-101.2-100.7	100.95	12/28/2004	5/8x3/4	7-1873	
Homestead	North	89075819	2/26/1998	100-101-99.2	100.9	2/26/1998	3/4	7-1990	
Homestead	South	62283668	1/14/2004	new	new	1/14/2004	1-1/2	7-1992	
Homestead	Center	91693583	2/26/1998	101-101-100	100.5	2/26/1998	1	7-1999	
Yarwood MHP	1190 Dixie	62396579	1/14/2004	new	new	1/14/2004	2	7-2200	
1170 Waterfield	1170 Waterfield	16511847	3/5/2007	100-100.5-100.4	100.45	8/28/2006	1	7-1717	
Lynch's MHP	1607 Wilson	15432625	9/27/2005	9809-99.5-99	99.25	7/28/2005	5/8x3/4	10-0940	
Lynch's MHP	1659 Wilson	15432627	9/27/2005	98.9-100-99.4	99.7	7/28/2005	5/8x3/4	10-1040	
Parkside Manor	1855 Wilson	56179052	12/15/2005	99-100-99.1	99.55	5/28/2002	1	10-1420	
Parkside Manor	1855 Wilson	oo2902	12/7/2005	98.5-99.5-101.2	100.35	12/15/2008	4	10-1320	
Duvail MHP	1255 Wilson	62552406	1/15/2004	new	new	1/15/2004	2	11-0612	
Masden MHP	Masden	15405028	12/22/2005	100-100.5-100.5	100.5	7/1/2005	2	11-1380	
Brentwood Estate	369 Elm	17573612	3/6/2008	99-100.4-99.2	99.8	11/1/2007	3/4	15-5880	
Brentwood Estate	369 Elm	16511863	3/6/2008	98-100-100.4	100.2	8/28/2006	1	15-5794	
Golden Rainbow	360 Hill	61239024	1/15/2004	new	new	1/15/2004	1-1/2	16-2498	
Combs Ln.	Combs Ln.	15666152	3/20/2006	100.9-101-100	100.5	12/14/2005	3/4	18-4140	

18-7195	1	7/29/2005	99.65	99-100-99.3	9/27/2005	15431809	Country	Country Lane
18-6181	1	1/26/2006	99.8	98.1-100-99.6	3/13/2006	16291339	2600 Knox	2600 Knox
18-7502	3/4	1/29/1999	100.05	96-101-99.1	2/5/1999	35980380	2010 Hill	2010 Hill
20-3078	3/4	5/3/2004	new	new	5/3/2004	30818382	Rogersville	Rogersville MHP
20-2809	1	5/3/2004	99.5	99-100-99	5/3/2004	61394785	Rogersville	Rogersville MHP
21-0221	5/8x3/4	2/9/1999	99.95	100-101-98.9	2/17/1999	88532993	Hill	Raisor MHP
21-1366	2	12/6/2005	new	new	12/22/2005	56741719	1445 Hill	Paradise MHP
21-0265	1	8/28/2006	100.9	100.2-101.5-100.3	2/25/2008	16511844	1349 Hill	Oak Hill MHP
22-7540	1	1/12/2006	99.1	98.1-99-99.2	2/21/2006	16281190	455 Rogersville	455 Rogersville

New indicates factory tested results not attached to history card

9. Provide the most recent test result for all individual meters within each of the MHCs since January 1, 2007.

ANSWER: Requested information is attached (See answer to question 10 also).

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

Service Address	Install	Meter ID	Test Date	Low	Med	High	Over all
360 Hill #26	1/31/2007	88278377	1/30/2007	99	100	98.7	99.35
1740 Dixie #mas	2/27/2007	56889589	2/27/2007	99	101	100.5	100.75
374 Oak #mas	3/6/2007	14815561	New	99.8	100.8	99.6	100.2
1674 Dixie #mas	3/6/2007	31634750	1/5/2007	98	101	101	101
1170 Waterfield #mas	3/6/2007	16511847	New	100	100.5	100.4	100.45
Southland #mas	3/26/2007	14815594	New	100.7	101.2	100.7	100.95
245 Globe #9	5/11/2007	82319601	2/8/2007	92	99	100	99.5
1190 Dixie #40	6/7/2007	60541877	2/5/2007	93	101	100.2	100.6
1190 Dixie #118	7/3/2007	57396563	8/30/2006	96	100	100.2	100.1
1855 Wilson #352	7/20/2002	60541874	12/4/2006	101	100	99.9	99.95
1855 Wilson #452	7/20/2007	57736397	1/17/2007	91	100	99.5	99.75
1190 Dixie #93	8/17/2007	59175607	8/30/2006	98	100	100	100
1855 Wilson #228	9/10/2007	81445984	2/14/2007	97	98	99.7	98.85
360 Hill #36	12/3/2007	88599148	10/12/2007	95	99	99	99
1855 Wilson #239	12/12/2007	62132336	8/30/2006	95	101	99.9	100.45
1349 Hill #mas	2/5/2008	16511844	New	100.2	101.5	100.3	100.9
1855 Wilson #3229	2/21/2008	57736537	2/8/2007	97	100	100.1	100.05
1855 Wilson #mas	12/15/2005	2902	12/15/2008	98.5	99.5	101.2	100.35

***Deviation from testing Case #2005-00225**

10. State whether the calculated line loss could be attributable to inaccurate individual meters within the MHCs. If not, state why that is an unreasonable conclusion.

ANSWER: It may be possible that some of the calculated water loss is due to meter error. However, to the best of our knowledge, all meters are within the Commission parameters as set forth in 807 KAR 5:066 Section 15 (a). All meters may not have been tested within the time specified in 807 KAR 5:066 Section 16 due to the PSC approved deviation, Case No.: 2005-00225. The District is not aware of any reason that the sub-set of meters within mobile home parks are any less accurate, slow or fast, than its total population of meters, especially given the fact that these size meters only need to be tested once each 10 years. (See attached latest quarterly meter testing report submitted to the Commission).

WITNESS: Mr. Brett Pyles, Operations Manager, HCWD1

QUARTERLY METER REPORT TO THE KENTUCKY PUBLIC SERVICE COMMISSION

Name of Utility: Hardin County Water District # 1
 Address: 1400 Rogersville Road
Radcliff, KY 40160
(270) 351-3222

Period Covered: JAN - MAR Date
 APR - JUN Submitted:
 JUL - SEP
 OCT - DEC 11/16/2005

TYPE CUSTOMERS	METERED	NON-METERED	TOTAL
Residential	8,531		8,531
Commercial	725		725
Industrial			
Other	128		128
Total Number	9,384		9,384

YEARS SINCE METER WAS LAST TESTED	NUMBER OF METERS "AS FOUND" (PERCENT ERROR)																METERS IN GROUP TESTED	METERS IN GROUP NOT TESTED	
	*	SLOW (-)								FAST (+)									
		> -10	-5.1 to -10	-4.1 to -5	-3.1 to -4	-2.1 to -3	-1.1 to -2	-0.1 to -1	0 to +/- 0.1	+0.1 to +1	+1.1 to +2	+2.1 to +3	+3.1 to +4	+4.1 to +5	+5.1 to +10	> +10			
New Meters	NR																0	0	
Less than 2 years	1							12	4	13							30	0	
2 to 4 years							2	1	7	2	9						21	0	
4 to 6 years		1					1	4	13	2	14						35	0	
6 to 8 years	2	2					1		3		2						10	0	
8 to 10 years	7	5	3	3			5	10	46	6	45	12					142	0	
over 10 years	3						1	7			1						12	0	
Time Unknown																			
TOTAL	13	8	3	3			9	16	88	14	84	12					250	0	

(* NR ~ Non-Registering)

Periodic Meter Test Program YES NO If NO, List Sample Method Plan & Case # _____
 Meters Removed From Service and Tested This Period 250
 New Meters Tested This Period 0
 Total Meters Tested This Period 250
 Utility or Approved Agency Doing Meter Testing Hardin County Water District # 1

"AS FOUND" ACCURACY	QUANTITY	%
Within 2% ± Error Limit	214	85.60%
More than 2% Fast	0	0.00%
More than 2% Slow	23	9.20%
Did not Register	13	5.20%

STATUS OF METER TEST PROGRAM	QUANTITY
Meters to be Tested this Year	1,124
Meters Tested to Date	833
Meters Still To Test	291

Number of Tests Made at Customer's Request During Period 5
 Number of Tests Made at Commission's Request During Period 0
 Number of Meters on Which Refunds Were Made During Period 0
 Total Amount of Refunds Made During Period 0
 Number of Customers Billed for Slow Meters During Period 0
 Total Amount Billed on Slow Meters During Period 0
 Number of Customers Billed for Non-Registering Meters During Period 0
 Total Amount Billed on Non-Registering Meters During Period 0

Report Covering Meter Tests Approved By:

Report Covering Customers and Refunds Approved By:

Signed: Michael Roy McKinley
 Title: Meter Technician W0784

Signed: Linda Thompson
 Title: Billing Specialist

**QUARTERLY METER REPORT
TO THE KENTUCKY PUBLIC SERVICE COMMISSION**

Name of Utility: Hardin County Water District # 1
 Address: 1400 Rogersville Road
Radcliff, KY 40160
(270) 351-3222

Period Covered: X JAN - MAR Date
 Year: 2005 APR - JUN Submitted:
 JUL - SEP
 OCT - DEC 4/13/2005

TYPE CUSTOMERS	METERED	NON-METERED	TOTAL
Residential	8,352		8,352
Commercial	738		738
Industrial			
Other	128		128
Total Number	9,218		9,218

YEARS SINCE METER WAS LAST TESTED	NUMBER OF METERS "AS FOUND" (PERCENT ERROR)																METERS IN GROUP TESTED	METERS IN GROUP NOT TESTED
	SLOW (-)								FAST (+)									
	* NR	> -10	-5.1 to -10	-4.1 to -5	-3.1 to -4	-2.1 to -3	-1.1 to -2	-0.1 to -1	0 to +/- 0.1	+0.1 to +1	+1.1 to +2	+2.1 to +3	+3.1 to +4	+4.1 to +5	+5.1 to +10	> +10		
New Meters																	0	0
Less than 2 years	5	2		1				3	1	3	13						28	
2 to 4 years	3	1						1	1		13						19	
4 to 6 years	3	1							5	1	3	1					14	
6 to 8 years									2		3	1					6	
8 to 10 years	9	7	5	4				2	6	43	5	76	11				168	
over 10 years	2							1		2		7	1				13	
Time Unknown																		
TOTAL	22	11	5	5				3	10	54	9	115	14				248	

(* NR - Non-Registering)

Periodic Meter Test Program YES X NO If NO, List Sample Method Plan & Case # _____
 Meters Removed From Service and Tested This Period 248
 New Meters Tested This Period 0
 Total Meters Tested This Period 248
 Utility or Approved Agency Doing Meter Testing Hardin County Water District # 1

"AS FOUND" ACCURACY	QUANTITY	%
Within 2% ± Error Limit	202	81.45%
More than 2% Fast	0	0.00%
More than 2% Slow	24	9.67%
Did not Register	22	8.87%

STATUS OF METER TEST PROGRAM	QUANTITY
Meters to be Tested this Year	1,124
Meters Tested to Date	248
Meters Still To Test	876

Number of Tests Made at Customer's Request During Period 4
 Number of Tests Made at Commission's Request During Period 0
 Number of Meters on Which Refunds Were Made During Period 0
 Total Amount of Refunds Made During Period 0
 Number of Customers Billed for Slow Meters During Period 0
 Total Amount Billed on Slow Meters During Period 0
 Number of Customers Billed for Non-Registering Meters During Period 0
 Total Amount Billed on Non-Registering Meters During Period 0

Report Covering Meter Tests Approved By:

Report Covering Customers and Refunds Approved By:

Signed: Michael K. The K... ..
 Title: Meter Technician W0784

Signed: Linda Thompson
 Title: Billing Specialist

11. Refer to Mr. Bruce's Advance Prepared Testimony, page 1, answer 1.
- a. State whether Hardin County agrees that the changes from master meters to individual lot meters made in the mid-1980s conflicted with then-existing utility regulations. Explain.
 - b. State whether Hardin County is of the opinion that the present individual metering system conflicts with 807 KAR 5:066, Section 12. Explain.
 - c. State whether Hardin County inspected these service lines, pursuant to 807 KAR 5:066, Section 9.

Answer

- a. The District is not aware of any regulations in place in the mid-1980's that may or may not have been in conflict with switching from master meters to individual meters. In talking with former employees, and current park owners, the District has been told anecdotally that this change was made as a decision between park owners and the then General Manager, Mr. Marvin Logsdon. The residents of the parks were then required to come in to the District office to open their own water and sewer account.

We have no record in our files of a change of tariff, or request to the Commission, for permission to change from a single master meter account in the park owners name, to individual lot meters. We have also been told that the meter materials were sold to park owners, who installed them at their expense. This practice is not consistent with any current, or known past, tariff of the District (selling materials only to customer and allowing them to install their own meter).

- b. Yes, because; 1) The District's distribution system is not on the private property of the MHC. Between the District's distribution system, and the individual meters and point of service, exist private, non-public water distribution system pipes that are not maintained by the District, but continue to be and have always been owned and maintained by the MHC owner, and
 - 2) The original master meter location, which was originally used to bill the property, did comply with 807 KAR 5:066, Section 12.
- c. To the best of our knowledge, Hardin County Water District No.1 employees did not inspect the installation of any service lines or private main water lines within any MHC's, because those lines are private plumbing and do not belong to the District. Please see attached sworn affidavits from current employees certifying this.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

GENERAL AFFIDAVIT

**Commonwealth of Kentucky
County of Hardin**

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 6th day of March, 2008, personally appeared

Timmy C. Walker, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.

YES _____ NO

(PLEASE CHECK ONE)

Timmy C. Walker
[signature]

Timmy C. Walker
[printed name]

Subscribed and sworn to before me, this 6th day of March, 2008.

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 22nd day of February, 2008, personally appeared

Curtis Pickerell, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.

YES NO

(PLEASE CHECK ONE)

Curtis Pickerell
[signature]

Curtis Pickerell
[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008.

Aaron B Pyles
[signature of Notary]

Aaron B Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008.

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, ~~Daniel Clifford~~ Aaron B Pyles

on this 21st day of February, 2008, personally appeared

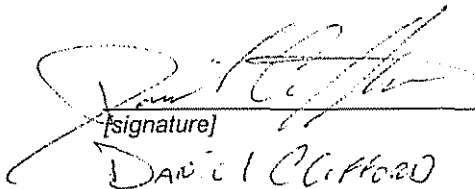
Daniel Clifford, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

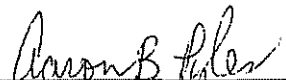
Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.

YES _____ NO X

(PLEASE CHECK ONE)


[signature]
Daniel Clifford
[printed name]

Subscribed and sworn to before me, this 21st day of February, 2008.


[signature of Notary]

Aaron B Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: Oct 30, 2008.

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 22nd day of February, 2008, personally appeared

Richard Stanahan, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.

YES _____ NO

(PLEASE CHECK ONE)

Richard Stanahan
[signature]

Richard Stanahan
[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008.

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 22nd day of February, 2008, personally appeared

Cecil Asberry, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No. 1 located in Hardin County Kentucky.

YES _____ NO X

(PLEASE CHECK ONE)

Cecil Asberry
[signature]

Cecil Asberry
[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008.

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008.

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 22nd day of February, 2008, personally appeared

Tim Bowman, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No. 1 located in Hardin County Kentucky.

YES _____ NO

(PLEASE CHECK ONE)



[signature]

Tim Bowman

[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008.

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 22nd day of February, 2008, personally appeared

JAY DAVIS, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No. 1 located in Hardin County Kentucky

YES _____ NO

(PLEASE CHECK ONE)

Jay Davis
[signature]
Jay Davis
[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008.

Aaron B. Pyles
[signature of Notary]
Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles,

on this 22nd day of February, 2008, personally appeared

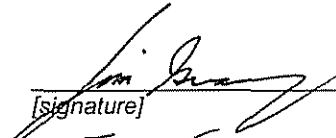
Jim Gray, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

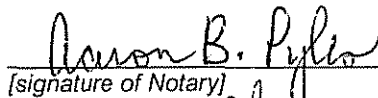
Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No. 1 located in Hardin County Kentucky.

YES _____ NO

(PLEASE CHECK ONE)


[signature]
Jim Gray
[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008


[signature of Notary]
Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008.

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 22nd day of February, 2008, personally appeared

John Mancik, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No. 1 located in Hardin County Kentucky.
YES _____ NO
(PLEASE CHECK ONE)

[Signature]
[signature]
John Mancik
[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008.

[Signature]
[signature of Notary]
Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE
My commission expires: October 30, 2008

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 22nd day of February, 2008, personally appeared

Jerry McCoy, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.

YES _____ NO X

(PLEASE CHECK ONE)

[Signature]
[signature]

Jerry McCoy
[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008.

[Signature]
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 22nd day of February, 2008, personally appeared

Marvin McKenzie, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.
YES _____ NO
(PLEASE CHECK ONE)

Marvin McKenzie
[signature]

MARVIN MCKENZIE
[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008.

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE
My commission expires: October 30, 2008.

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 22nd day of February, 2008, personally appeared

Michael D. Moseley, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.

YES _____ NO X

(PLEASE CHECK ONE)

Michael D. Moseley

[signature]

Michael D Moseley

[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008

Aaron B Pyles

[signature of Notary]

Aaron B. Pyles

[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 22nd day of February, 2008, personally appeared

Greg Howard, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.
YES _____ NO
(PLEASE CHECK ONE)

Greg Howard
[signature]

Greg Howard
[printed name]

Subscribed and sworn to before me, this 22nd day of February, 2008.

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 5th day of March, 2008, personally appeared

John M. Thomas, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No. 1 located in Hardin County Kentucky.

YES _____ NO

(PLEASE CHECK ONE)

John M. Thomas
[signature]
JOHN M. THOMAS
[printed name]

Subscribed and sworn to before me, this 5th day of March, 2008.

Aaron B. Pyles
[signature of Notary]
Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Ryles

on this 3rd day of March, 2008, personally appeared

Steven Ellington, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.

YES _____ NO X

(PLEASE CHECK ONE)

Steve Ellington
[signature]

Stephen Ellington
[printed name]

Subscribed and sworn to before me, this 3rd day of March, 2008.

Aaron B Ryles
[signature of Notary]

Aaron B Ryles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008.

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 28th day of February, 2008, personally appeared

Michael McKinley, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.

YES _____ NO

(PLEASE CHECK ONE)

Michael R. McKinley
[signature]

Michael R. McKinley
[printed name]

Subscribed and sworn to before me, this 28 day of Feb., 2008

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008.

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 27th day of February, 2008, personally appeared

Donald G. Underhill, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No. 1 located in Hardin County Kentucky.

YES _____ NO _____

(PLEASE CHECK ONE)

Donald G. Underhill
[signature]

Donald G. Underhill
[printed name]

Subscribed and sworn to before me, this 27th day of February, 2008

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 27th day of February, 2008, personally appeared

Philip W. Clark, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.

YES _____ NO

(PLEASE CHECK ONE)

Philip W. Clark
[signature]

Philip W. Clark
[printed name]

Subscribed and sworn to before me, this 27th day of February, 2008.

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008.

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 27th day of February, 2008, personally appeared

John C. Cecil, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on his oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No. 1 located in Hardin County Kentucky.

YES _____ NO X

(PLEASE CHECK ONE)

John C. Cecil
[signature]

John C. Cecil
[printed name]

Subscribed and sworn to before me, this 27th day of February, 2008

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008.

GENERAL AFFIDAVIT

Commonwealth of Kentucky
County of Hardin

BEFORE ME, the undersigned Notary, Aaron B. Pyles

on this 27th day of February, 2008, personally appeared

Melissa Lepping, known to me to be a credible person and of lawful age, who being

by me first duly sworn, on her oath, deposes and says:

Have you ever inspected the installation of a potable water service line or main water line in ANY mobile home park in the current service area for Hardin County Water District No.1 located in Hardin County Kentucky.

YES _____ NO X

(PLEASE CHECK ONE)

Melissa Lepping
[signature]

Melissa Lepping
[printed name]

Subscribed and sworn to before me, this 27th day of February, 2008.

Aaron B. Pyles
[signature of Notary]

Aaron B. Pyles
[printed name of Notary]

NOTARY PUBLIC STATE AT LARGE

My commission expires: October 30, 2008.

12. Refer to Mr. Bruce's Advance Prepared Testimony, page 1, answer 6. Provide all documentation of instances in which fecal or E.coli bacteria was present in water that had a filled meter pit.

ANSWER: The requested information is attached.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1



McCoy & McCoy Laboratories, Inc.
 P. O. Box 907
 Madisonville, KY 42431

Lexington KY Paducah KY
 859-299-7775 270-444-6547
 Madisonville KY Pikeville KY
 270-821-7375 606-432-3104

www.mccoyslabs.com

T.Tapp-Bowles@mccoyslabs.com

Hardin Co Water District #1
 Attn: Phil Clark
 1400 Rogersville Road
 Radcliff KY 40160

Batch #: 07022149
 Received: 02/23/2007
 Reported: 02/27/2007
 Client: HA7170
 Page: 1 of 2

Analysis Report

AF08639 1430 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report Limit	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1640	hr/min		

AF08640 1431 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report Limit	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1640	hr/min		

AF08641 1432 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report Limit	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1700	hr/min		

AF08642 1433 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report Limit	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1700	hr/min		

AF08643 1434 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report Limit	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1700	hr/min		

AF08644 1435 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report Limit	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1710	hr/min		



McCoy & McCoy Laboratories, Inc.
 P. O. Box 907
 Madisonville, KY 42431

Lexington KY Paducah KY
 859-299-7775 270-444-6547
 Madisonville KY Pikeville KY
 270-821-7375 606-432-3104

www.mccoyslabs.com

T.Tapp-Bowles@mccoyslabs.com

Hardin Co Water District #1
 Attn: Phil Clark
 1400 Rogersville Road
 Radcliff KY 40160

Batch #: 07022149
 Received: 02/23/2007
 Reported: 02/27/2007
 Client: HA7170
 Page: 2 of 2

Analysis Report

AF08645 1436 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report Limit	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1710	hr/min		

AF08646 1437 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report Limit	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>6000	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1715	hr/min		

AF08647 1438 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report Limit	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>6000	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1715	hr/min		

AF08648 1440 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report Limit	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>6000	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1730	hr/min		

Note Legend

> : Above the given client test limit

Submitted By: Tammy Bowles
 Tammy Tapp-Bowles, Data Reviewer

The analyses reported above have been determined by protocols that meet or exceed the requirements of NELAC. Methods listed with an "*" are not part of this accreditation. Call Tammy Tapp-Bowles at 270-821-7375 for any questions concerning this analysis report



**McCoy & McCoy
Laboratories, Inc.**

PO Box 907 * 825 Industrial Road
Madisonville, KY 42431
270.821.7375
270.825.9200 fax

2456 Fortune Dr., Suite 155
Lexington, KY 40509
859.299.7775
859.299.7785 fax

173 Island Creek Rd.
Pikeville, KY 41501
606.432.3104
606.432.3171 fax

1800 Kentucky Ave.
Paducah, KY 42003
270.444.6547
270.444.6572 fax

www.mccoyslabs.com
email: info@mccoyslabs.com

Client HARDIN Co WATER DIST #1 Phone: _____ Page 1 of 2
 Batch 07022145 PO # _____
 AF08639 - 48 Collected By: Client

Sample ID	Collection		Sample Type C/G	Sample Point / Description	# of Containers	Sample Matrix	pH	Temp	Preservative
	Date	Time							
1740 Dixie	2-23-07	2:30	G		1	AQ			
"	"	2:31	G		1	AQ			
"	"	2:32	G		1	AQ			
"	"	2:33	G		1	AQ			
"	"	2:34	G		1	AQ			
"	"	2:35	G		1	AQ			
"	"	2:36	G		1	AQ			

Comments:

Field Data (QA/QC) Information
 Relinquished by: [Signature] Date/Time: 2-23-07 1500
 Received by: [Signature] Date/Time: 2-23-07 1500
 Relinquished by: [Signature] Date/Time: 2-23-07 16:10
 Received by: [Signature] Date/Time: 2/23/07 16:10



**McCoy & McCoy
Laboratories, Inc.**

PO Box 907 • 825 Industrial Road
Madisonville, KY 42431
270.821.7375
270.825.9200 fax

2456 Fortune Dr., Suite 155
Lexington, KY 40509
859.299.7775
859.299.7785 fax

173 Island Creek Rd.
Pikeville, KY 41501
606.432.3104
606.432.3171 fax

1800 Kentucky Ave.
Paducah, KY 42003
270.444.6547
270.444.6572 fax

www.mccoyslabs.com

email: info@mccoyslabs.com

Client: HARDIN Co. WATER DIST # 1

Phone: _____

Contact: _____

Logbatch: _____

Page 2 of 2

PO # _____

Collected By: Client

For MMLI use only	Collection		Sample Type C/G	Sample Point / Description	# of Containers	Sample Matrix Aqueous / Solid / Chemical	PH	Temp	Preservative
	Date	Time							
Sample ID									
1740 DIXIE	2-23-07	2:37	G		AQ				
"	"	2:38	G		AQ				
"	"	2:40	G		AQ				

Comments:

Field Data (QA/QC) Information	Relinquished by: <u>Ami Guy</u>	Date/Time: <u>2-23-07 15:00</u>
pH Meter #:	Received by: <u>Gray Henry</u>	Date/Time: <u>2-23-07 15:00</u>
DO Meter #:	Relinquished by: <u>Gray Henry</u>	Date/Time: <u>2-23-07 16:10</u>
Performed By:	Received by: <u>Gray Henry</u>	Date/Time: <u>2/23/07 16:10</u>

McCoy & McCoy Laboratories, Inc.
P.O. Box

Madisonville, KY
www.mccoyslabs.com

Hardin Co Water District #1
Attn: Phil Clark
1400 Rogersville Road
Radcliff KY 40160

Lexington KY Paducah KY
859-299-7775 270-444-6547
Madisonville KY Pikeville KY
270-821-7375 606-432-3104

T Tapp-Bowles@mccoyslabs.com

Batch #: 07022149
Received: 02/23/2007
Reported: 02/27/2007
 02/27/2007

Client: HA7170
Page: 1 of 2

Analysis Report

AF08639 1430 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1640	hr/min		

AF08640 1431 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1640	hr/min		

AF08641 1432 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1700	hr/min		

AF08642 1433 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1700	hr/min		

AF08643 1434 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1700	hr/min		

AF08644 1435 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1710	hr/min		

McCoy & McCoy Laboratories, Inc.
P. O. Box

Madisonville, KY

www.mccoyslabs.com

Hardin Co Water District #1
Attn: Phil Clark
1400 Rogersville Road
Radcliff KY 40160

Lexington KY Paducah KY
859-299-7775 270-444-6547
Madisonville KY Pikeville KY
270-821-7375 606-432-3104

T.Tapp-Bowles@mccoyslabs.com

Batch #: 07022149
Received: 02/23/2007
Reported: 02/27/2007
02/27/2007

Client: HA7170
Page: 2 of 2

Analysis Report

AF08645 1436 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1710	hr/min		

AF08646 1437 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>6000	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1715	hr/min		

08647 1438 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>6000	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1715	hr/min		

AF08648 1440 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>6000	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1730	hr/min		

Note Legend

> : Above the given client test limit.

Submitted

Tammy Tapp-Bowles, Data Reviewer

The analyses reported above have been determined by protocols that meet or exceed the requirements of NELAC Methods listed with an "*" are not part of this accreditation. Call Tammy Tapp-Bowles at 270-821-7375 for any questions concerning this analysis report.

McCoy & McCoy Laboratories, Inc.
P. O. Box

Madisonville, KY

www.mccoyslabs.com

Hardin Co Water District #1
Attn: Phil Clark
1400 Rogersville Road
Radcliff KY 40160

Lexington KY Paducah KY
859-299-7775 270-444-6547
Madisonville KY Pikeville KY
270-821-7375 606-432-3104

T Tapp-Bowles@mccoyslabs.com

Batch #: 07022149
Received: 02/23/2007
Reported: 02/27/2007
 02/27/2007

Client: HA7170
Page: 1 of 2

Analysis Report

AF08639 1430 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1640	hr/min		

AF08640 1431 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1640	hr/min		

F08641 1432 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1700	hr/min		

AF08642 1433 1740 Dixie Collected: 2/23/2007

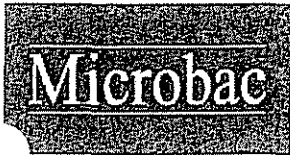
Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1700	hr/min		

AF08643 1434 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1700	hr/min		

AF08644 1435 1740 Dixie Collected: 2/23/2007

Test Description	Analyzed	By	Method	Result	Units	Report	Note
Fecal Coliform, (MF)	02/23/2007	DJB	SM 9222-D	>600	#/100 mls	10	>
Time of Analysis, Fecal	02/23/2007	DJB	SM 9222-D	1710	hr/min		



Microbac Laboratories, Inc.

KENTUCKY TESTING LABORATORY DIVISION
3323 Gilmore Industrial Blvd Louisville, KY 40213 502 962 6400 Fax: 502 962 6411
Evansville, IN 812 464 9000 | Frankfort, KY 502 803 0254 | Paducah, KY 270 898 3637

Member
ACIL

Chemical, Biological, Physical, Molecular, and Toxicological Services

ELECTRONIC CERTIFICATE OF ANALYSIS

0604-01055

**HARDIN COUNTY WATER DIST. #1
PHIL CLARK
1400 ROGERSVILLE ROAD
RADCLIFF, KY 40160**

**Date Reported 04/20/2006
Date Due 04/27/2006
Date Received 04/18/2006
Date Sampled 04/17/2006
Invoice No. 78012
Customer # H050
Customer P.O.**

DRINKING WATER / WASTEWATER

Analysis	Qualif	Result	Unit	Method	Date	Tech
Sample: 001 SP 1 / 1561 VINE					Date & Time Sampled: 4/17/2006 @ 12:12	
COLIFORM		<1	PER 100ML	SM 9222B	04/18/2006	CJL
TIME OF ANALYSIS, COLIFORM		1545			04/18/2006	CJL
Sample: 002 SP 2 / 1561 VINE					Date & Time Sampled: 4/17/2006 @ 12:13	
COLIFORM		<1	PER 100ML	SM 9222B	04/18/2006	CJL
TIME OF ANALYSIS, COLIFORM		1545			04/18/2006	CJL
Sample: 003 SP 3 / 1561 VINE					Date & Time Sampled: 4/17/2006 @ 12:14	
COLIFORM		<1	PER 100ML	SM 9222B	04/18/2006	CJL
TIME OF ANALYSIS, COLIFORM		1545			04/18/2006	CJL
✓ Sample: 004 82 / 1190 DIXIE / LOT #82					Date & Time Sampled: 4/18/2006 @ 9:39	
COLIFORM, FECAL	*	4000	PER 100ML	SM 9222D	04/18/2006	CJL
TIME OF ANALYSIS, FECAL		1640			04/18/2006	CJL
.....						
✓ Sample: 005 84 / 1190 DIXIE / LOT #84					Date & Time Sampled: 4/18/2006 @ 9:51	
COLIFORM, FECAL		30	PER 100ML	SM 9222D	04/18/2006	CJL
TIME OF ANALYSIS, FECAL		1640			04/18/2006	CJL
✓ Sample: 006 94 / 1190 DIXIE / LOT #94					Date & Time Sampled: 4/18/2006 @ 9:59	
COLIFORM, FECAL		20	PER 100ML	SM 9222D	04/18/2006	CJL
TIME OF ANALYSIS, FECAL		1640			04/18/2006	CJL
✓ Sample: 007 37 / 1501 DIXIE / LOT #37					Date & Time Sampled: 4/18/2006 @ 10:45	
COLIFORM, FECAL	*	>60000	PER 100ML	SM 9222D	04/18/2006	CJL
TIME OF ANALYSIS, FECAL		1640			04/18/2006	CJL
.....						



Date of Issue: June 15, 2005

Page 1 of 5

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rodgersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 360 Hill #76A.

BECKMAR CERTIFICATE OF ANALYSIS # 151122

Sample Date: 6/7/2005

Sample Time: 12:25

Sampled by: Mr. Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	120	col/100ml	G	SM9222d	6/7/2005 16:30	JPC

Remarks:

If you have any questions please call

Thank you,

Joe P. Carney
Quality Control Officer

JPC:dwt

ENVIRONMENTAL
LABORATORY

Dyersburg Business Park

800 Industrial Parkway

Dyersburg, TN 37722

TEL: 238-5533

FAX: 238-4447



Date of Issue: June 15, 2005

Page 2 of 5

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rodgersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1445 Hill #73.

BECKMAR CERTIFICATE OF ANALYSIS # 151123

Sample Date: 6/7/2005
Sample Time: 12:35
Sampled by: Mr. Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 1200	col/100ml	G	SM9222d	6/7/2005 10:30	JPC

Remarks:

If you have any questions please call.

Thank you,

Joe P. Carney
Quality Control Officer

JPC:dwt

ENVIRONMENTAL
LABORATORY

Jeffersonville Business Park
1000 Schlegel Parkway
Jeffersonville, KY 40299
502-266-8533
502-266-3414



Date of Issue: June 15, 2005

Page 3 of 5

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rodgersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1740 Dixie #428.

BECKMAR CERTIFICATE OF ANALYSIS # 151124

Sample Date: 6/7/2005

Sample Time: 12:45

Sampled by: Mr. Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 1200	col/100ml	G	SM9222d	6/7/2005 10:30	JPC

Remarks:

If you have any questions please call.

Thank you,

Joe P. Carney
Quality Control Officer

JPC:dwt

ENVIRONMENTAL
LABORATORY

Jeffersonville Business Park

10000 Hickory Ridge Parkway

Jeffersonville, KY 40229

TEL: 502.236.6370

FAX: 502.236.6115



Date of Issue: June 15, 2005

Page 4 of 5

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rodgersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1190 Dixie #82.

BECKMAR CERTIFICATE OF ANALYSIS # 151125

Sample Date: 6/7/2005

Sample Time: 13:00

Sampled by: Mr. Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	>1200	col/100ml	G	SM9222d	6/7/2005 10:30	JPC

Remarks:

If you have any questions please call

Thank you,

Joe P. Carney
Quality Control Officer

JPC:dwt

ENVIRONMENTAL
LABORATORY

Manufacturing Business Park

10000 Rockledge Parkway

Indianapolis, IN 46227

317-251-6533

317-251-6111

Date of Issue: June 26, 2003

Page 1 of 3

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: Smith #3.

BECKMAR CERTIFICATE OF ANALYSIS # 113407

Sample Date: 6/25/03

Sample Time: 9:20

Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 6000	col/100ml	G	SM9222d	6/25/03 14:00	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: June 26, 2003

Page 2 of 3

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: Smith #376.

BECKMAR CERTIFICATE OF ANALYSIS # 113408

Sample Date: 6/25/03

Sample Time: 9:16

Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 6000	col/100ml	G	SM9222d	6/25/03 14:00	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: June 26, 2003

Page 3 of 3

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: Smith #12.

BECKMAR CERTIFICATE OF ANALYSIS # 113409

Sample Date: 6/25/03

Sample Time: 9:30

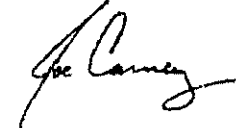
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 6000	col/100ml	G	SM9222d	6/25/03 14:00	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: December 10, 2003

Page 3 of 3

Hardin County Water District #1 c/o Mr. Phil Clark
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1401 Vine - Lot 59.

BECKMAR CERTIFICATE OF ANALYSIS # 122277

Sample Date: 12/3/2003

Sample Time: 13:10

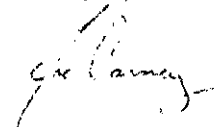
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	>120,000	col/100ml	G	SM9222d	12/3/2003 14:40	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Facsimile Transmittal

Beckmar Environmental Laboratory Inc.
 3251 Ruckriegel Parkway
 Louisville, KY 40299
 Phone: (502) 266-6533
 Fax: (502) 266-6446
 www.beckmarlab.com



To: Jim Gray From: D. Tracy
 Fax: 270-352-3055 Pages: 4
 Phone: _____ Date: 12/10/03
 Re: _____ CC: _____

- Urgent For Review Please Comment Please Reply Please Recycle

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● Comments:

Date of Issue: December 10, 2003

Page 1 of 3

Hardin County Water District #1 c/o Mr. Phil Clark
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1401 Vine - Lot 53.

BECKMAR CERTIFICATE OF ANALYSIS # 122275

Sample Date: 12/3/2003

Sample Time: 13:07

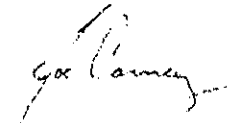
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	4000	col/100ml	G	SM9222d	12/3/2003 14:40	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: December 10, 2003

Page 2 of 3

Hardin County Water District #1 c/o Mr. Phil Clark
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1401 Vine - Lot 54.

BECKMAR CERTIFICATE OF ANALYSIS # 122276

Sample Date: 12/3/2003

Sample Time: 13:09

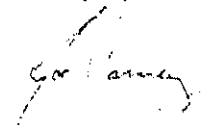
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	2000	col/100ml	G	SM9222d	12/3/2003 14:40	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: January 10, 2003

Page 1 of 4

Hardin Co. Water District #1 c/o Mr. Jim Bruce
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: Fecal Coliform: Septic water.

BECKMAR CERTIFICATE OF ANALYSIS # 103847 - 103858

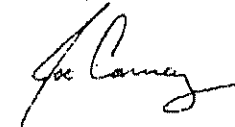
Sample Date: 1/9/03
Sample Time: See COC
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
1401 Vine: #31	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
1401 Vine: #59	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
1401 Vine: #81	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
1401 Vine: #82	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Dixie MHP: #115	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Dixie MHP: #122	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Dixie MHP: #428	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Dixie MHP: #318	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Smith: #376	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Smith: #3	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Smith #12	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
1304 Elm: #18	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: January 10, 2003

Page 2 of 4

Hardin Co. Water District #1 c/o Mr. Jim Bruce
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: Fecal Coliform: Septic water.

BECKMAR CERTIFICATE OF ANALYSIS # 103859 - 103863

Sample Date: 1/9/03

Sample Time: See COC

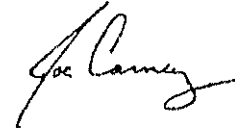
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
1304 Elm: #18-b	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Parkside: #353	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Parkside: #303	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Parkside #297	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Parkside: #357	> 12000	col./100ml	G	SM9222d	1/9/03 15:00	PDB

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt



Date of Issue: June 15, 2005

Page 1 of 5

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rodgersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 360 Hill #76A.

BECKMAR CERTIFICATE OF ANALYSIS # 151122

Sample Date: 6/7/2005

Sample Time: 12:25

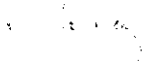
Sampled by: Mr. Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	120	col/100ml	G	SM9222d	6/7/2005 16:30	JPC

Remarks:

If you have any questions please call

Thank you,


Joe P. Carney
Quality Control Officer

JPC:dwt

ENVIRONMENTAL
LABORATORY

Jeffersonville Business Park

3000 Backriegel Parkway

Jeffersonville, KY 40299

502-266-4333

502-266-4141



Date of Issue: June 15, 2005

Page 2 of 5

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rodgersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1445 Hill #73.

BECKMAR CERTIFICATE OF ANALYSIS # 151123

Sample Date: 6/7/2005

Sample Time: 12:35

Sampled by: Mr. Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 1200	col/100ml	G	SM9222d	6/7/2005 10:30	JPC

Remarks:

If you have any questions please call

Thank you,

Joe P. Carney
Quality Control Officer

JPC:dwt

ENVIRONMENTAL
LABORATORY

Jeffersonton Business Park

Rockledge Parkway

Jeffersonton KY 40229

tel: 202 4533

fax: 202 203 0144



Date of Issue: June 15, 2005

Page 3 of 5

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rodgersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1740 Dixie #428.

BECKMAR CERTIFICATE OF ANALYSIS # 151124

Sample Date: 6/7/2005

Sample Time: 12:45

Sampled by: Mr. Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 1200	col/100ml	G	SM9222d	6/7/2005 10:30	JPC

Remarks:

If you have any questions please call

Thank you,

Joe P. Carney
Quality Control Officer

JPC:dwt

ENVIRONMENTAL

LABORATORY

Highway Business Park

Rockledge Parkway

Highway KY 40177

606-343-6500

1-800-368-6116



Date of Issue: June 15, 2005

Page 4 of 5

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rodgersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1190 Dixie #82.

BECKMAR CERTIFICATE OF ANALYSIS # 151125

Sample Date: 6/7/2005

Sample Time: 13:00

Sampled by: Mr. Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 1200	col/100ml	G	SM9222d	6/7/2005 10:30	JPC

Remarks:

If you have any questions please call.

Thank you,

Joe P. Carney
Quality Control Officer

JPC:dwt

ENVIRONMENTAL
LABORATORY

Jeffersonton Business Park

10000 Briegleb Parkway

Jeffersonton, KY 10299

402-466-6515

402-466-6515

Date of Issue: June 26, 2003

Page 1 of 3

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: Smith #3.

BECKMAR CERTIFICATE OF ANALYSIS # 113407

Sample Date: 6/25/03

Sample Time: 9:20

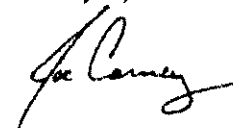
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 6000	col/100ml	G	SM9222d	6/25/03 14:00	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: June 26, 2003

Page 2 of 3

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: Smith #376.

BECKMAR CERTIFICATE OF ANALYSIS # 113408

Sample Date: 6/25/03

Sample Time: 9:16

Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 6000	col/100ml	G	SM9222d	6/25/03 14:00	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: June 26, 2003

Page 3 of 3

Hardin County Water District #1 c/o Mr. Jim Gray
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: Smith #12.

BECKMAR CERTIFICATE OF ANALYSIS # 113409

Sample Date: 6/25/03

Sample Time: 9:30

Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	> 6000	col/100ml	G	SM9222d	6/25/03 14:00	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: December 10, 2003

Page 3 of 3

Hardin County Water District #1 c/o Mr. Phil Clark
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1401 Vine - Lot 59.

BECKMAR CERTIFICATE OF ANALYSIS # 122277

Sample Date: 12/3/2003

Sample Time: 13:10

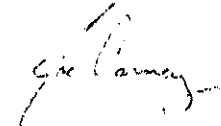
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	>120,000	col/100ml	G	SM9222d	12/3/2003 14:40	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Facsimile Transmittal

Beckmar Environmental Laboratory Inc.
3251 Ruckriegel Parkway
Louisville, KY 40299

Phone: (502) 266-6533

Fax: (502) 266-6446

www.beckmarlab.com



To: <u>Jim Gray</u>	From: <u>D. Gray</u>
Fax: <u>270-352-3055</u>	Pages: <u>4</u>
Phone:	Date: <u>12/10/03</u>
Re:	CC:

- Urgent
 For Review
 Please Comment
 Please Reply
 Please Recycle

Confidential Notice:

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● Comments:

Date of Issue: December 10, 2003

Page 1 of 3

Hardin County Water District #1 c/o Mr. Phil Clark
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1401 Vine - Lot 53.

BECKMAR CERTIFICATE OF ANALYSIS #122275

Sample Date: 12/3/2003

Sample Time: 13:07

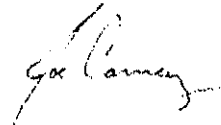
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	4000	col/100ml	G	SM9222d	12/3/2003 14:40	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: December 10, 2003

Page 2 of 3

Hardin County Water District #1 c/o Mr. Phil Clark
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: 1401 Vine - Lot 54.

BECKMAR CERTIFICATE OF ANALYSIS #122276

Sample Date: 12/3/2003

Sample Time: 13:09

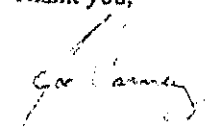
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
Fecal Coliform	2000	col/100ml	G	SM9222d	12/3/2003 14:40	ALN

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: January 10, 2003

Page 1 of 4

Hardin Co. Water District #1 c/o Mr. Jim Bruce
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: Fecal Coliform: Septic water.

BECKMAR CERTIFICATE OF ANALYSIS # 103847 - 103858

Sample Date: 1/9/03

Sample Time: See COC

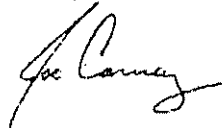
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
1401 Vine: #31	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
1401 Vine: #59	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
1401 Vinc: #81	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
1401 Vine: #82	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Dixie MHP: #115	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Dixie MHP: #122	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Dixie MHP: #428	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Dixie MHP: #318	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Smith: #376	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Smith: #3	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Smith #12	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
1304 Elm: #18	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

Date of Issue: January 10, 2003

Page 2 of 4

Hardin Co. Water District #1 c/o Mr. Jim Bruce
1400 Rogersville Rd.
Radcliff, KY 40160

RE: Analysis results for: Fecal Coliform: Septic water.

BECKMAR CERTIFICATE OF ANALYSIS # 103859 - 103863

Sample Date: 1/9/03

Sample Time: See COC

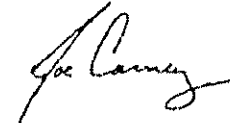
Sampled by: Mr. Jim Gray

Parameter	Results	Units	Type	Method	Analyzed Date / Time	Analyst
1304 Elm: #18-b	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Parkside: #353	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Parkside: #303	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Parkside #297	> 3000	col/100ml	G	SM9222d	1/9/03 15:00	PDB
Parkside: #357	> 12000	col/100ml	G	SM9222d	1/9/03 15:00	PDB

Remarks:

If you have any questions please call.

Thank you,



Joe P. Carney
Quality Control Officer

JPC:dwt

13. Provide all correspondence with MHCs regarding Hardin County's proposed tariff.

ANSWER: The requested information is attached.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

March 11, 2008

Yarwood Mobile Home Park
Mr. Don Case
P.O. Box 2006
Covington, KY 41012
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - October 2007
Yarwood Mobile Home Park**

Dear Mr. Case;

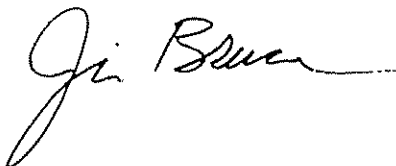
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of February, the loss rate is 40.7%, which was a total un-billed and wasted water amount of 91,400 gallons. This means that for every 100 gallons being delivered to your park, about 40 is not being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$680 per month in added water and sewer charges.

We recommend that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

March 11, 2008

Parkside Manor Mobile Home Park
Wiseman Homes - OR CURRENT OWNER
1855 Wilson Avenue
Radcliff, KY 40160
CERTIFIED MAIL

Parkside Manor Mobile Home Park
Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - February 2008
Parkside Manor Mobile Home Park**

Dear Park Owner / Manager;

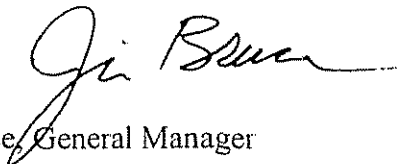
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of February, the loss rate is 33.7%, which was a total un-billed and wasted water amount of 365,100 gallons. This means that for every 100 gallons being delivered to your park, about 34 gallons is not being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$2,716 per month in added water and sewer charges.

This letter provides our fifth consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

March 11, 2008

Parkside Manor Mobile Home Park
Wiseman Homes - OR CURRENT OWNER
1855 Wilson Avenue
Radcliff, KY 40160
CERTIFIED MAIL

Parkside Manor Mobile Home Park
Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - February 2008
Parkside Manor Mobile Home Park**

Dear Park Owner / Manager;

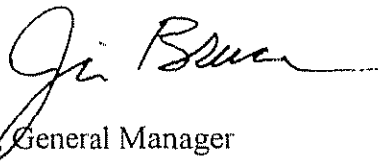
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of February, the loss rate is 33.7%, which was a total un-billed and wasted water amount of 365,100 gallons. This means that for every 100 gallons being delivered to your park, about 34 gallons is not being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$2,716 per month in added water and sewer charges.

This letter provides our fifth consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

March 11, 2008

Park Valley Mobile Home Park
Ms. Joy McCarthy - OR CURRENT RESIDENT
1010 Issac Franklin Dr.
Gallatin, TN 37066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - February 2008
Park Valley Mobile Home Park**

Dear Ms. McCarthy;

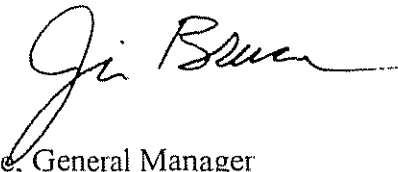
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of February, the loss rate is 95.3%, which was a total un-billed and wasted water amount of 243,600 gallons. The leak rate increased by about 340% from the previous month. This means that for every 100 gallons being delivered to your park, about 95 is not being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$1,932 per month in added water and sewer charges.

We recommend that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the *Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks.* We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

March 11, 2008

Paradise Mobile Home Park
Mr. Richard DeRuiter - OR CURRENT OWNER
1445 Hill Street
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - October 2007
Paradise Mobile Home Park**

Dear Mr. DeRuiter;

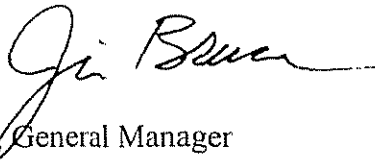
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month, the loss rate is 39.8%, which was a total un-billed and wasted water amount of 110,000 gallons. This means that for every 100 gallons being delivered to your property, only 39.8 gallons are not being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$830 per month in added water and sewer charges.

This letter provides our fifth consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

December 24, 2007

Ms. Stefanie Wiseman
3740 May St.
Los Angeles, California 90066

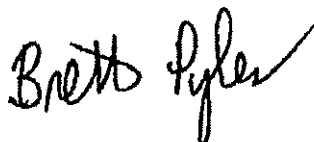
SUBJECT: Parkide MHP Agreement

Dear Ms. Wiseman;

Please find attached an executed copy of the agreement to have Kentucky Rural Water Association assist in locating leaks in the above mentioned mobile home park. As soon as a date and time have been set to begin the leak detection procedure, I will contact your onsite maintenance man and coordinate with him.

Thank you for your efforts on this matter. Please feel free to contact me or Jim if you have any questions.

Sincerely,



Brett Pyles, Operations Manager

CC: file

Brett Pyles

From: Brett Pyles
Sent: Monday, December 24, 2007 10:14 AM
To: 'd.harris@krwa.org'
Cc: 'David Wilson, SBW'; Jim Bruce; 'kybruce@bbtel.com'
Subject: Parkside MHP Agreement
Attachments: Doc071224(001).PDF

Dell,

Hope you are having a great holiday. Please find attached a copy of the executed agreement with Parkside MHP. When you get back in the office, please look at your schedule and let me know when would be a good time for you to perform the leak detection activities. As soon as you get a time scheduled, I will notify the park maintenance man and we will get the ball rolling.

Thanks,

Brett

<i>Hardin County Water District No. 1</i>		<i>"Serving Hardin County for over 50 years"</i>	
Brett Pyles <i>Operations Manager</i>		1400 Rogersville Road Radcliff, KY 40130	
bpyles@hcwd.com www.HCWD.com		tel: 270 351 3222 fax: 270 352 3055 mobile: 270 766 9477	
<i>Want to always have my latest info?</i>		<i>Want a signature like this?</i>	

Jim Bruce

From: Jim Bruce
Sent: Tuesday, December 18, 2007 12:30 PM
To: 'SLWiseman@aol.com'
Cc: Brett Pyles; 'SBW David T. Wilson (E-mail)'
Subject: RE: Parkside Water Agreement
Attachments: Parkside MHP leak agt V2.pdf

Stefanie;

Here is the revised agreement. We showed it to our atty, and he was OK with all the suggested changes. If you decide to go ahead, please sign and date and have witness do same and FAX back to 270-352-3055. We will then sign and send you a copy for your records. We would then contact Roger and set up a time. *Most likely it will be after first of year,* and will have to wait until ground is more dry. The KRWA person will also have to fit into his schedule. He travels all around state doing *leak detection studies, so I am not sure when he will be able to come.*

Thanks for your consideration of this agreement and having this service performed. Please call if you have any questions

Jim Bruce
General Manager
HCWD1

From: SLWiseman@aol.com [mailto:SLWiseman@aol.com]
Sent: Monday, December 17, 2007 9:19 PM
To: Jim Bruce
Subject: Parkside Water Agreement

Hi Jim,
My attorney has FINALLY gotten back to me with the agreement showing his changes. It is marked so you can see the revisions. Please give me a call if you have any questions or problems with them and we can discuss it.
Thanks.
Stefanie Wiseman
310-502-8197

See AOL's top rated recipes (<http://food.aol.com/top-rated-recipes?NCID=aoltop00030000000004>)

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

November 27, 2007

Golden Rainbow Mobile Home Park
Mr. Philip Corneilson
318B Hill Street
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - October 2007
Golden Rainbow Mobile Home Park**

Dear Mr. Corneilson,

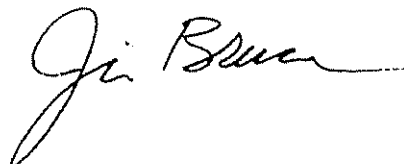
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of October, the loss rate is 29%, which was a total un-billed and wasted water amount of 41,700 gallons. The leak rate did decrease by about 40% from the previous month. This means that for every 100 gallons being delivered to your park, about 30 is not being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$313 per month in added water and sewer charges.

This notice letter provides our second request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

November 27, 2007

Paradise Mobile Home Park
Mr Richard DeRuiter - OR CURRENT OWNER
1445 Hill Street
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - October 2007
Paradise Mobile Home Park**

Dear Mr DeRuiter,


This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month, the loss rate is 72%, which was a total un-billed and wasted water amount of 113,900 gallons, which is up about 33% from the prior month. This means that for every 100 gallons being delivered to your property, only 28 gallons are being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$855 per month in added water and sewer charges.

This letter provides our fourth consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice.

Sincerely,


Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

November 27, 2007

Park Valley Mobile Home Park
Ms. Joy McCarthy - OR CURRENT OWNER
1010 Issac Franklin Drive
Gallatin, TN 37066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - October 2007
Park Valley Mobile Home Park**

Dear Ms. McCarthy,

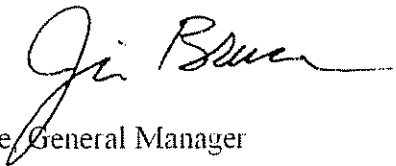
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot

For the most recent month of October, the loss rate is 286%, which was a total un-billed and wasted water amount of 43,200 gallons. This is a slight increase from the previous in the loss percentage. This means that there is still almost 3 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$325 per month in added water and sewer charges

This letter provides our third consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

November 27, 2007

Parkside Manor Mobile Home Park
Wiseman Homes - OR CURRENT OWNER
1855 Wilson Avenue
Radcliff, KY 40160
CERTIFIED MAIL

Parkside Manor Mobile Home Park
Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - October 2007
Parkside Manor Mobile Home Park**

Dear Park Owner / Manager,

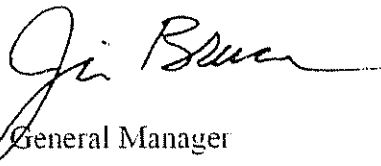
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot

For the most recent month of October, the loss rate is 269%, which was a total un-billed and wasted water amount of 1,878,500 gallons. This means that there is still almost 3 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$14,090 per month in added water and sewer charges.

This letter provides our fourth consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice

Sincerely,



Jim Bruce, General Manager

FAX TRANSMISSION

Hardin County Water District No. 1

1400 Rogersville Road
Radcliff, KY 40160
(270) 351-3222 FAX: (270) 352-3055
www.HCWD.com

TO: STEPHANIE WISEMAN DATE: 11-2-07
FAX Number: 854-266-3682
NUMBER OF PAGES (Including Cover): 2
FROM: JIM BRUCE
ORIGINAL TO FOLLOW IN MAIL: Yes No
SUBJECT: _____

COMMENTS:

PLEASE SEE THAT MS WISEMAN
GETS THIS

THANKS!

Jim Bruce

(Please call if you do not receive all of the pages)

THE DOCUMENTS ACCOMPANYING THIS TRANSMISSION ARE CONFIDENTIAL AND CONSIDERED LEGALLY PRIVILEGED. THIS INFORMATION IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. THE AUTHORIZED RECIPIENT OF THIS INFORMATION IS PROHIBITED FROM DISCLOSING THIS INFORMATION TO ANY OTHER PARTY UNLESS REQUIRED TO DO SO BY LAW OR REGULATION. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION, OR ACTION TAKEN IN RELIANCE ON THE CONTENTS OF THESE DOCUMENTS IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS INFORMATION IN ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY.

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY 40160

November 2, 2007

Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066

SUBJECT: Pending Water Main Extension Agreements

Dear Ms. Wiseman,

I thought I had your phone number, but could not find it, so I am sending by FAX this information. I am sorry I did not realize Mr. Lynwood Wiseman was your father when we have talked before. I enjoyed meeting with him several times, and found him to be a very interesting and friendly person.


We did check our pending agreements that still have potential refunds. We have one with North Hardin Developers for Hilltop Terrace Section 7 which still has \$2,831.97 in potential refunds, but none have been paid since June 2003. Those refunds were mailed to 592 Eureka Springs, in Lexington

We also have a second one with Mr. Lynwood Wiseman / North Hardin Developers for Notting Hills, Phase I. There is a balance of \$6,914.32 but no refunds have taken place since the third quarter of 2005.

Depending on how many vacant lots are still in these developments, and when and if future water taps are purchased, would determine how much, if any, future refunds would be made. The amount of the refund per tap is set, and varies by contract. If you wanted more information on these agreements, you could also call our office and talk to Ms. Karen Brown.

I hope this provides the information you were requesting. If not, please do not hesitate to call me.

Sincerely,


Jim Brice
General Manager

FAX TRANSMISSION

Hardin County Water District No. 1

1400 Rogersville Road
Radcliff, KY 40160
(270) 351-3222 FAX: (270) 352-3055
www.HCWD.com

TO: STEPHANIE WISEMAN

DATE: 10-25-07

FAX Number: 859-266-3682

NUMBER OF PAGES (Including Cover): 2

FROM: JIM BRUCE

ORIGINAL TO FOLLOW IN MAIL: Yes No

SUBJECT: _____

COMMENTS:

STEPHANIE,
COPY OF MAILED LETTER PER
YOUR PHONE REQUEST

Jim Bruce

(Please call if you do not receive all of the pages)

THE DOCUMENTS ACCOMPANYING THIS TRANSMISSION ARE CONFIDENTIAL AND CONSIDERED LEGALLY PRIVILEGED. THIS INFORMATION IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. THE AUTHORIZED RECIPIENT OF THIS INFORMATION IS PROHIBITED FROM DISCLOSING THIS INFORMATION TO ANY OTHER PARTY UNLESS REQUIRED TO DO SO BY LAW OR REGULATION. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION, OR ACTION TAKEN IN RELIANCE ON THE CONTENTS OF THESE DOCUMENTS IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS INFORMATION IN ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY.

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

October 16, 2007

Parkside Manor Mobile Home Park
Wiseman Homes - OR CURRENT OWNER
1855 Wilson Avenue
Radcliff, KY 40160
CERTIFIED MAIL

Parkside Manor Mobile Home Park
Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066
CERTIFIED MAIL

SUBJECT: Notice of Excessive Water Loss - September 2007
Parkside Manor Mobile Home Park

FAX'D TO
85-9-266-3682
PER SW REQUEST
10/25/07
S: STAM
JST

Dear Park Owner / Manager,

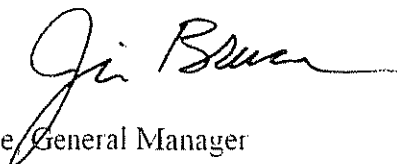
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of September, the loss rate is 268%, which was a total un-billed and wasted water amount of 1,828,500 gallons. This means that there is still almost 3 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$13,710 per month in added water and sewer charges.

This letter provides our third consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

October 16, 2007

Parkside Manor Mobile Home Park
Wiseman Homes - OR CURRENT OWNER
1855 Wilson Avenue
Radcliff, KY 40160
CERTIFIED MAIL

Parkside Manor Mobile Home Park
Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - September 2007
Parkside Manor Mobile Home Park**

Dear Park Owner / Manager;

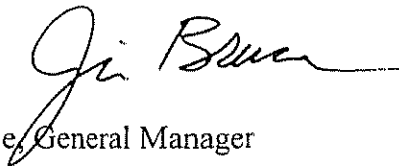
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of September, the loss rate is 268%, which was a total un-billed and wasted water amount of 1,828,500 gallons. This means that there is still almost 3 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$13,710 per month in added water and sewer charges.

This letter provides our third consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

October 16, 2007

Golden Rainbow Mobile Home Park
Mr. Philip Corneilson
318B Hill Street
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - September 2007
Golden Rainbow Mobile Home Park**

Dear Mr. Corneilson;

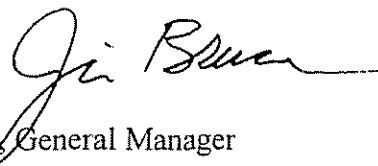
This letter is to notify you that excessive water loss occurs at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of September, the loss rate is 34%, which was a total un-billed and wasted water amount of 75,800 gallons. This means that for every 1,000 gallons being delivered to your park, about 350 is not being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$570 per month in added water and sewer charges.

This letter provides our request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

October 16, 2007

Parkside Manor Mobile Home Park
Wiseman Homes - OR CURRENT OWNER
1855 Wilson Avenue
Radcliff, KY 40160
CERTIFIED MAIL

Parkside Manor Mobile Home Park
Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - September 2007
Parkside Manor Mobile Home Park**

Dear Park Owner / Manager;

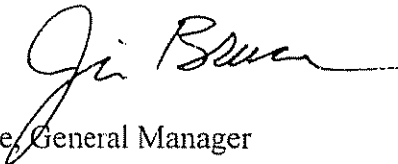
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of September, the loss rate is 268%, which was a total un-billed and wasted water amount of 1,828,500 gallons. This means that there is still almost 3 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$13,710 per month in added water and sewer charges.

This letter provides our third consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Skeeters, Bennett, Wilson, and Pike

Donald Skeeters
Terry Bennett
David T. Wilson II
Michael A. Pike

Attorneys at Law
550 W. Lincoln Trail Blvd
Radcliff, Kentucky 40160
www.sbw-law.com

Tel: (270) 351-4404
Fax: (270) 352-4626
Real Estate Dept:
Tel: (270) 352-4406
Fax: (270) 352-4421

Case No:
2007-00461

October 15, 2007

RECEIVED

OCT 17 2007

PUBLIC SERVICE
COMMISSION

Public Service Commission
Attn: Mr. Brent Kirtley
P.O. Box 615
Frankfort, Ky 40601

Re: Hardin County Water District No. 1; Tariff Modification

Dear Mr. Kirtley:

In accordance with our telephone conversation of October 15, 2007, please find enclosed a proposed tariff modification along with testimony offered by the General Manager of Hardin County Water District No. 1, Mr. Jim Bruce.

Please note that the proposed effective date is December 15, 2007.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

SKEETERS, BENNETT, WILSON & PIKE



David T. Wilson II

DTW:dnf
Enclosure

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

October 10, 2007

Paradise Mobile Home Park
Mr. Richard DeRuiter
1445 Hill Street
Radcliff, KY 40160

SUBJECT: Follow-up to Phone Call

Dear Mr. DeRuiter;

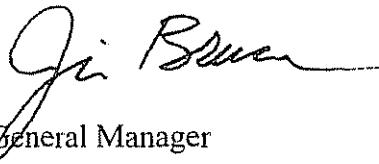
This letter is in response to our phone conversation on or about October 4. You had called and requested that we check the meter and reading at your Paradise Mobile Home Park.

Mr. Brett Pyles, Operations Manager, and myself checked the master meter on October 10, 2007 at about 9:20AM. We found the reading to be 65,056. The previous reading of the master meter was 62,333 and was read on September 5, 2007. I have also enclosed a list of past readings. The most recent reading does seem consistent with past readings, and I believe is accurate. Between the two most recent readings, a total of 272,300 gallons had gone through the meter (for 35 days).

On the day we inspected the meter, we found a steady flow rate of about 1.4 gpm (gallons per minute), which would be about a monthly use of about 60,480 gallons. However, this was after 8AM in the morning, which is not a peak time for water use. Still, the 1.4 gpm rate indicates a lower leak rate than our most recent billing period (for master meter), which showed a leak rate of just over 3 gpm (132,700 gallons in 30 days). It is possible that since September 5th, you have been able to repair some of the larger leaks which appears to have reduced the leak rate.

I hope this is helpful and provides you the information you requested. We appreciate your efforts to find and repair leaks of un-billed water within your park. We are proceeding with the filing of our new tariff, which may take several months to be reviewed and approved by the PSC. We will continue to provide you updates on water loss in future months. Please call if you need any other information.

Sincerely,



Jim Bruce, General Manager

Cf; Mr. Brett Pyles, HCWDI Operations Manager

Encl.

- + File
- Utility Billing
 - Account Maintenance
 - Customer Mainten
 - Location Mainten
 - Meter/Device Mal
 - Backflow Manag
 - Quick Application
 - + Readings
 - + Batch Entries
 - + Periodic
 - + UB Administration
 - + Reports
- + Technical Services
- + Accounting
- + System Administration
- + Window
- + Help

Meter	MID	Backflow	Register	Misc
Search for Meter ID/Number		Current physical location		
Meter number		1445 HILL #MASTE		Note
56741719		Customer name		
		PARADISE M-P		
Meter ID/number	Serial number	Alt sort	Alt meter number	Meter location
56741719	64061551			

Reading	Estimated	Usage	Demand reading	kVAR reading	Read date	Changed meter number	Usage from change out
5233300		315500			9/5/2007		
5917800		307200			8/6/2007		
5610600		280900			7/6/2007		
5329700		275600			6/6/2007		
5054100		362500			5/7/2007		
4691600		300000			4/5/2007		
4391600		289500			3/7/2007		
4103100		324400			2/6/2007		
3768700		261800			1/5/2007		
3506900		241500			12/6/2006		
3265400		263200			11/6/2006		
3002200		253400			10/5/2006		
2748800		268700			9/5/2006		
2480100		240900			8/4/2006		
2239200		252100			7/6/2006		
1987100		367800			6/6/2006		
1619300		350000			5/5/2006		
1269300		293600			4/5/2006		
975700		293700			3/7/2006		
682000		339500			2/6/2006		
342500		0			1/6/2006		

General Reading Info Stock Info Transactions Edit Reading Devices Company Defined

Scrap Test

- Customer Maintenance
- Meter Maintenance

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

September 26, 2007

Parkside Manor Mobile Home Park
Wiseman Homes - OR CURRENT OWNER
1855 Wilson Avenue
Radcliff, KY 40160
CERTIFIED MAIL

Parkside Manor Mobile Home Park
Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - August 2007
Parkside Manor Mobile Home Park**

Dear Park Owner / Manager;

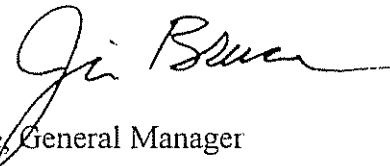
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of August, the loss rate is 250%, which was a total un-billed and wasted water amount of 1,899,100 gallons. This means that there is still almost 3 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$14,250 per month in added water and sewer charges.

This letter provides our third consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

September 26, 2007

Homestead Mobile Home Park
Ms. Rebecca Arthur - OR CURRENT OWNER
1190 S. Dixie Boulevard
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Reduced Water Loss - August 2007
Homestead Mobile Home Park**

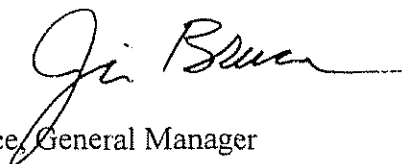
Dear Ms. Arthur;

This letter is to notify you excessive water loss at your property appears to have been reduced substantially. For the most recent month of August, the loss rate was 14%, down from 158% for the July billing period.

Our District is proceeding with a tariff change through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. Should you have any large future leaks, after the new tariff were in place, you would be required to pay for all the leaked water costs, as the difference between water delivered to the park, and the amount billed to renters, would be billed directly to the park owner / manager.

We greatly appreciate your efforts to find and repair leaks within your private plumbing. This reduced leak rate saves the District, and all of our customers, unnecessary costs and expense. Should you request the leak rate for a future month, do not hesitate to call me, or our Billing Specialist, Ms. Linda Thompson.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

September 26, 2007

Park Valley Mobile Home Park
Ms. Joy McCarthy - OR CURRENT OWNER
1010 Issac Franklin Drive
Gallatin, TN 37066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - August 2007
Park Valley Mobile Home Park**

Dear Ms. McCarthy;

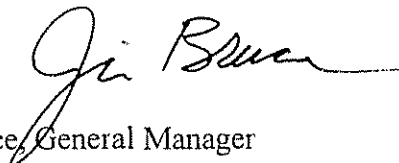
This letter is to notify you that high water loss continues to occur at your property, as of the latest reading date. After talking with you today, I understand your maintenance manger has found and fixed seven leaks. On August 28, 2007, two of our employees met with Mr. Stacey Haas to assist him in measuring water loss rate, and showed him some areas on your property where leaks may have been.

For the most recent month of August, the loss rate was 972%, which was a total un-billed and leaked water amount of 79,700 gallons, which is down about 38% from the prior month. This means that there is almost 9 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This would be caused by any leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the August leak rate, this additional charge would add about \$600 per month in added water and sewer charges.

We do appreciate your efforts to find and repair the recent leaks. We will continue to monitor the reduction in future months, and I will call or email you and let you know the latest leaked amount, if any. We would anticipate that the next billing period would show a substantial reduction, since the repaired leaks would reduce the water loss during that full billing period.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

September 25, 2007

Paradise Mobile Home Park
Mr. Richard DeRuiter - OR CURRENT OWNER
1445 Hill Street
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - August 2007
Paradise Mobile Home Park**

Dear Mr. DeRuiter;

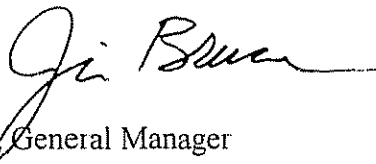
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month, the loss rate is 42%, which was a total un-billed and wasted water amount of 132,700 gallons, which is up about 53% from the prior month. This means that for every 100 gallons being delivered to your property, only 58 gallons are being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$995 per month in added water and sewer charges.

This letter provides our third consecutive request that you take immediate action to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. We are proceeding with our filing with the Public Service Commission to change our tariff, and reserve the right to take other action against your park, to limit the amount of water being delivered, or recover excessive costs being caused by your leaks. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Jim Bruce

From: Jim Bruce
Sent: Tuesday, September 25, 2007 5:27 PM
To: 'joyride2@aol.com'
Cc: Brett Pyles; Charlene Easter
Subject: Copy of Letter on water loss
Attachments: Park valley August.pdf

Joy;

Here is the latest letter being mailed. Our Board requests that we continue to send letters to highest loss parks, using certified mail. As the letter states, we would expect the amount to drop considerable between the Aug and Sept bill. I will call you next month as soon as we calculate the amount.

Let me know if you have any questions

Jim Bruce
General Manager
HCWD1
Ph: 270-268-4069

Jim Bruce

From: Jim Bruce
Sent: Tuesday, September 25, 2007 5:18 PM
To: 'Bill Gossett'; 'Bill Rissel (E-mail)'; 'Jim Bruce (E-mail 2)'; 'John Tindall (E-mail)'; 'Les Powers'; 'Ron Hockman (E-mail)'; 'SBW David T. Wilson (denise.freeland@sbw-law.com)'; 'SBW David T. Wilson (E-mail)'
Cc: Brett Pyles; Charlene Easter
Subject: MHP Loss Rate Update / Rad Sewer Update
Attachments: MHP Leak Warn Aug 07.pdf

Board;

Here are latest letters to park owners, based on latest billing period. Comparing the August to July total park billings, the total loss went down about 34%, but the total gallons lost was still 2,448,900 gallons, down from 3,194,500.

You will also notice Homestead MHP has cut their loss to an acceptable level, after we met with their manager and give him ideas for finding leaks. We also met with Park Valley, and I talked with their owner, and she said their manager found 7 leaks, after we gave them ideas also.

Paradise and Parkside continue to have large leak rates, and Paradise increased considerably from the prior month. The largest culprit is Parkside, who causes 78% of the total MHP loss for the most recent month. We have talked to their manager, but he just said he does not believe our readings, and cannot be leaking that much within their park.

The owner of Park Valley I spoke to (in TN) was very appreciative of our assistance and help in this process.

Let me know if you have any questions. I will keep you posted on any new info.

Also, FYI, I was contacted today by News Enterprise reporter. He is doing a story on District/Radcliff sewer acquisition. I sent him info we provided to Council. The Mayor had called me about noon, and said she heard from a wife of a City employee (who used to work in sewer department) who was not happy with Veolia, or several other unrelated issues with how the City is being managed (Challenger Center, Cardinal Health, storm sewer projects). She sent letter to editor with her complaints, and some mis-information about Veolia, and the arrangement of City divesting of the system. The District was not mentioned in the letter. The Mayor asked the NE reporter to at least contact me, to explain that the system is not being turned over to Veolia, but the District. He called me twice with some questions about the proposed MOU and District's role. He referred to article they already wrote in January, which was pretty accurate, and explained the District's role.

Thanks

Jim Bruce

INTRA-AGENCY MEMORANDUM

KENTUCKY PUBLIC SERVICE COMMISSION

TO: Case File No. 2007-00246
FROM: Todd Osterloh, Staff Attorney ^{TO}
DATE: August 24, 2007
RE: Conference of August 22, 2007

On August 22, 2007, the Commission held a conference in this case in the Commission's offices in Frankfort, Kentucky. Present were:

David T. Wilson	-	Hardin County Water District No. 1
Jim Bruce	-	Hardin County Water District No. 1
Brett Pyles	-	Hardin County Water District No. 1
Charlene Easter	-	Hardin County Water District No. 1
Mark Frost	-	Commission Staff
Jason Green	-	Commission Staff
Sam Reid	-	Commission Staff
Todd Osterloh	-	Commission Staff

Hardin County Water District No. 1 ("District") requested this meeting to discuss a draft of a proposed tariff modification regarding manufactured housing communities ("MHCs").

Beginning the conference, Mr. Osterloh stated that Commission Staff would prepare minutes of the conference for the case record, that a copy of these minutes would be provided to all parties, and that all parties would be given an opportunity to submit written comments upon those minutes

Mr. Bruce provided a background for the District's possible tariff modification. He stated that in the late 1980s, the MHCs served by the district were billed based on a master meter. The District revised its billing practices to begin billing based on individual meters at each manufactured home location. As a result, each manufactured home has its own water meter, and the District bills each residential unit individually

Over the course of several years, the District began experiencing significant water loss within some of the MHCs. The District Board requested District Staff's advice as to possible solutions. The District Staff recommended a master meter billing system for the MHCs. In order to gather public input, the District held public meetings on June 19, 2006 and August 1, 2006. Some, but not all, MHCs were represented and made comments at these meetings. Mr. Bruce also presented the results of a District

survey relating to these issues. During the past few months, the District has sent out two letters to the four MHCs experiencing the most line loss, encouraging the property owners to repair leaks in their lines

After this background information was presented, Mr. Osterloh offered some advice on what information the Commission may consider, if the District were to file a tariff modification related to master metering for Commission approval. It was first noted that KRS 74.080 and 278.030 call for the Commission to determine whether the tariff is "reasonable." Mr. Osterloh informed that master metering is generally discouraged for a variety of reasons. First, it prevents price signals to customers, which in turn reduces conservation of resources. Second, it raises the possibility of shutting off water service to innocent residents. Nevertheless, *master metering is not per se unreasonable, and has been approved for use by water districts in the past.*

Commission Staff believes that the determination of reasonableness will be based on balancing the reality of inefficient and ineffective water service to the MHCs as it presently exists against the treatment of the present customers in the MHCs. In terms of water service, Commission Staff recognizes that substandard lines can create health concerns for both the customers and District employees who work on the line. In addition, the substandard lines can also generate significant water loss that must be subsidized by all District customers.

On the other side, there are outstanding questions raised by the District's course of dealing with the MHC residents. Because the District currently bills residents of MHCs based on a meter adjacent to each manufactured home, a question arises as to who is responsible for maintaining and servicing the lines within each MHC. According to 807 KAR 5:066, Section 12, a customer is responsible for keeping the service line—the water line from the outlet of the water meter to the place of consumption—in good repair. The utility is responsible for the line from the main to the outlet of the meter. The regulation also states that "the customer's point of service [outlet of the water meter] shall be located at that point on or near the street right of way or property line most accessible to the utility from its distribution system." Commission Staff is not confident that the Commission would approve of a tariff change, if the change effectively switched the responsibility of servicing a substandard line from the utility to the property owner without improvements to the line.

The Commission issued a decision on an issue related to line responsibility in light of 807 KAR 5:066, Section 12 (Northern Kentucky Water District, Case No. 2005-00148), in which it found that lines running from the distribution main to a meter located inside a building should be serviced and maintained by the utility even though the line is on private property. Northern Kentucky Water District was granted a rehearing, which was held on August 8, 2007. The Commission has yet to issue its decision on the

rehearing. Commission Staff recommended that the District review the pertinent case filings¹ and video of the rehearing² of the Northern Kentucky Water District case because its outcome may be indicative of the Commission's treatment of the District's tariff modification case.

Commission Staff stated that the Commission would likely want evidence to make a factual determination as to ownership of the various parts of the distribution system. Several questions were suggested, including who initially installed the lines on the MHC property, who installed the meters, when was the last installation, who has serviced the lines and meters since their installation, and does the District have an easement over the MHC property to conduct line repairs. Commission Staff also offered a couple of legal questions that may be addressed, including whether an easement can be implied under these circumstances and whether the installation complied with the regulations as they existed at the time of the installation.

Commission Staff also stated that the Commission may inquire into the distribution system of the various MHCs. They informed the District that questions may be raised as to whether the system meets the minimum requirements of 807 KAR 5.066 and whether the District complied with the inspection requirements of 807 KAR 5.066, Section 9(3).

Throughout the course of the conference, the District informed Commission Staff as to the prevalence of the water loss problem affiliated with MHCs in their district. The District has approximately 26 MHCs, which serve nearly 900 manufactured homes, and the four MHCs with the most water loss on their lines account for 3 million gallons per month loss. The District is billing roughly 3 million gallons per month, which represents a 100% water loss for these four MHCs. The entire district system averages approximately 7% water loss.

Mr. Osterloh distributed sections of various other water district's tariffs related to mobile home parks. These tariff sections were from U.S. 60 Water District, Muhlenberg County Water District, Boone County Water District, McCreary County Water District, and Bullock Pen Water District. These sections were distributed in order to provide examples of tariff provisions that were previously found to be reasonable.

¹ Most, if not all, of this case's filings can be found at <http://psc.ky.gov/pscscf/2005%20cases/2005-00148/>.

² The video can be accessed on the web at http://psc.ky.gov/av_broadcast/2005-00148/2005-00148_08Aug07_inter.asx.

Mr. Osterloh also offered some suggestions on the wording of the proposed tariff modification. He stated that the second sentence of paragraph 1, which mentions that the classification applicability is "primarily" MHCs, could create ambiguity in application. He recommended changing the word "section" in paragraph 3 to "classification" for clarity. He related concerns of enumerating items in paragraph 3(b), because it could create ambiguity when something that the District intends to fall under that paragraph does not fit snugly into one of those enumerated items. Instead of deleting the list, another option would be to include a phrase such as "including, but not limited to." Mr. Osterloh suggested deleting any inference that the tariff would trump Commission regulations, such as language found in paragraph 4 of the tariff modification or paragraph 6 of the private property metering agreement. It was also suggested that the Commission may find the tariff modification more reasonable if the District were required to provide notice of disconnection to the MHC residents. Mr. Bruce mentioned that the District has hung notices on doors in the past, when the utility has had to turn off a master meter.

In addition to the proposed tariff modification, Mr. Osterloh also identified a few provisions in the District's tariff that may conflict with the tariff modification and may need to be changed, if the modification is approved. On sheet 7 of the tariff, paragraph A.3. states that the location of the meter shall be near the street right-of-way. This may conflict with the submeters located at the individual manufactured homes. In addition, paragraph A.9 states that there should be a meter installed for each dwelling unit, and this provision may conflict with the master meter billing system. On sheet 8 of the tariff, it was suggested that the tariff modification would create a new customer classification that would need to be added to the list in paragraph 1.

After these discussions took place, the District stated that they planned to file the tariff modification with the Commission, pursuant to 807 KAR 5:011. Commission Staff noted that the District's request for an informal conference on the draft of the tariff modification initiated a formal case on the Commission's docket. Staff suggested that the future filing of a tariff modification before the Commission, which would trigger the statutory deadlines of KRS 278.190, would be better submitted as a new filing with a new case number. Accordingly, Staff recommended—and the District agreed—for the District to file a request to close the present case (2007-00246), either in the form of a letter or motion. Commission Staff also stated that when the District files its proposed tariff modification before the Commission, the District may want to address the reasons for the proposed modification in a cover letter. Commission Staff also suggested that the District could compile and attach to their filing any evidentiary support and/or testimony regarding the issues discussed in the conference, in order to aid in the processing of their case.

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August 24, 2007

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One final point of clarification was made as to the District's treatment of the billing of the MHCs prior to a Commission ruling on this issue. As the District indicated in their most recent letter to the MHCs, the District has no intention of billing the MHCs based on the master meter readings until it obtains Commission approval to do so.

The conference then adjourned.

cc: Parties of Record

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

August 20, 2007

Parkside Manor Mobile Home Park
Wiseman Homes - OR CURRENT OWNER
1855 Wilson Avenue
Radcliff, KY 40160
CERTIFIED MAIL

Parkside Manor Mobile Home Park
Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - July 2007
Parkside Manor Mobile Home Park**

Dear Park Owner / Manager;

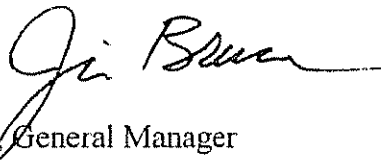
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of July, the loss rate is 271%, which was a total un-billed and wasted water amount of 2,127,900 gallons. This means that there is still almost 3 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$15,750 per month in added water and sewer charges.

We again strongly suggest you take action immediately to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. If the amount is not reduced within 30 days, we will have to initiate other actions or remedial measures. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

August 20, 2007

Homestead Mobile Home Park
Ms. Rebecca Arthur - OR CURRENT OWNER
1190 S. Dixie Boulevard
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - July 2007
Homestead Mobile Home Park**

Dear Ms. Arthur;

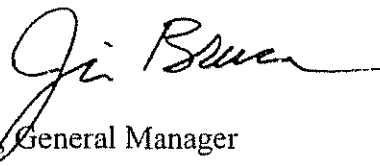
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of July, the loss rate is 158%, which was a total un-billed and wasted water amount of 482,300 gallons, which is down about 5% from the prior month. This means that there is about 1.5 times water is being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$3,570 per month in added water and sewer charges.

We again strongly suggest you take action immediately to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. If the amount is not reduced within 30 days, we will have to initiate other actions or remedial measures. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

August 20, 2007

Parkside Manor Mobile Home Park
Wiseman Homes - OR CURRENT OWNER
1855 Wilson Avenue
Radcliff, KY 40160
CERTIFIED MAIL

Parkside Manor Mobile Home Park
Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - July 2007
Parkside Manor Mobile Home Park**

Dear Park Owner / Manager;

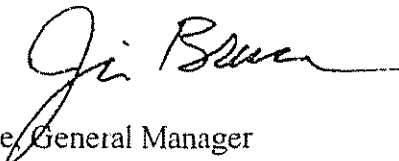
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of July, the loss rate is 271%, which was a total un-billed and wasted water amount of 2,127,900 gallons. This means that there is still almost 3 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$15,750 per month in added water and sewer charges.

We again strongly suggest you take action immediately to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. If the amount is not reduced within 30 days, we will have to initiate other actions or remedial measures. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY 40160

July 25, 2007

Ms. Stephanie Wiseman
Trustee - Parkside Mobile Home Park
3740 May Street
Los Angeles, CA 90066

SUBJECT: Meter Information - Parkside Mobile Home Park

Dear Ms. Wiseman;


As requested, here is the information on meters currently installed for the above mobile home park. There are two master meters, which all the water flowing into the park goes through and is measured. These are currently not used for billing, but we do use these to measure how much water is leaking within the park. A third master meter is also installed to the park, but is not currently turned on, or providing water to the park at that location.

The two master meters are a 4 inch (new in 2005) and a 1 inch. The 4 inch is designed to accurately measure up to 1,233 gallons per minute (or 53,265,600 gallons per month) and the 1 inch up to 50 gallons per minute (or 2,160,000 gallons per month). As both points are feeding the park, the total gallons going into the park are being split between these locations. As to how the water is distributed within the park, or what proportion goes through which meter, we would not know this. This is because the lines within the park are private, and are not maintained by the District, nor were installed by the District. There may or may not be different valves within the park plumbing, which cause the plumbing to be isolated to one or both master meters.

There are currently 207 meters within the park used to bill the renters directly. This number can change daily, as renters move in or out of the park, and open and close accounts with us. We also may need to change or remove meters, due to maintenance of the individual meters. From time to time, we may have to remove a lot meter, as customers sometimes tamper with the meter after being turned off for non-payment. All our small meters will be replaced with a new radio read meter within the next three years. As these accounts are with those individuals, and you are not the account holder, we are unable to provide private or payment information about those persons or individual accounts.

I hope this provides the information requested. If you have other questions, please do not hesitate to call. We can also provide future leak information if requested in the future. We are monitoring the water being delivered to the park on a monthly basis, but it is currently a manual process and only compare the water going through the master meters once monthly, using the same day of the month we read the lot meters.

Sincerely,



Jim Bruce
General Manager

Encl.

Jim Bruce

From: Jim Bruce
Sent: Thursday, July 19, 2007 12:51 PM
To: 'joyride2@aol.com'
Cc: Brett Pyles; Charlene Easter
Subject: Park Valley MHP Leak Records
Attachments: PV MHP Leak 2006.pdf; PV MHP Leak 2007.pdf

Ms. McCarthy;

Here are copies of our spreadsheets we have used to track water going into park, and water billed at individual meters at lots. We currently do this manually, because we are not actually creating a bill on our system for the master meter, but are reading it on same day we read the lot meters (used for billing) and then compare the water used for the last month.

If you have any more questions, please do not hesitate to call.

Thanks

Jim Bruce
General Manager, HCWD1

Jim Bruce

From: Jim Bruce
Sent: Thursday, July 05, 2007 3:49 PM
To: Bill Gossett; 'Bill Rissel (E-mail)'; 'Jim Bruce (E-mail 2)'; 'John Tindall (E-mail)'; Les Powers; 'Ron Hockman (E-mail)'; SBW David T. Wilson (denise.freeland@sbw-law.com); 'SBW David T. Wilson (E-mail)'
Cc: Brett Pyles; Charlene Easter
Subject: MHP Warning Letter - Follow up
Attachments: MHP Leak Warn.pdf

Board;

Roger ? called me from ^{PARKSIDE} Paradise Manor MHP (huge 1.8MG leak) He said he did not see how that much could be leaking, without a geyser or huge pond in his park. I explained it could be multiple smaller leaks, at a rate of about 41 gpm. I also explained that at Dixie, much of leaking water was finding its way into sewer system, but some was on top of ground. He asked if we could help him find leaks. I told him we really were not plumbers, but can only measure water at meter going into park, and then he would need to find leaks. He said he has no valves in park, and only way he could do this was to turn off indiv meters in park, and see if that isolates leaks, watching master meter. I told him that might work, and knew it was tedious, process which would take time. He said he had found several leaks in last month. I offered to call him when we have next readings, to see if it was going down. He said he would appreciate that very much, and has been following our process, and attended some of the meetings.

FYI

Jim Bruce

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

June 28, 2007

Homestead Mobile Home Park
Ms. Rebecca Arthur - OR CURRENT OWNER
1190 S. Dixie Boulevard
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss
Homestead Mobile Home Park**

Dear Ms. Arthur;


This letter is to notify you that excessive water loss is occurring at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month, the loss rate is 203%, which was a total un-billed and wasted water amount of 508,200 gallons. This means that there is about double what water is being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$3,756 per month in added water and sewer charges.

You are requested to begin action immediately to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. If the amount is not reduced within 60 days, we will have to initiate other actions or remedial measures. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

June 28, 2007

Parkside Manor Mobile Home Park
Wiseman Homes - OR CURRENT OWNER
1855 Wilson Avenue
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss
Parkside Manor Mobile Home Park**

Dear Park Owner / Manager;

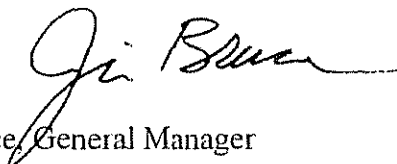
This letter is to notify you that excessive water loss is occurring at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month, the loss rate is 268%, which was a total un-billed and wasted water amount of 1,852,000 gallons. This means that there is almost 3 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$13,686 per month in added water and sewer charges.

You are requested to begin action immediately to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. If the amount is not reduced within 60 days, we will have to initiate other actions or remedial measures. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

June 28, 2007

Paradise Mobile Home Park
Mr. Richard DeRuiter - OR CURRENT OWNER
1445 Hill Street
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss
Paradise Mobile Home Park**

Dear Mr. DeRuiter;


This letter is to notify you that excessive water loss is occurring at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month, the loss rate is 35%, which was a total un-billed and wasted water amount of 71,000 gallons. This means that for every 100 gallons being delivered to your property, only 65 gallons are being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$525 per month in added water and sewer charges.

You are requested to begin action immediately to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. If the amount is not reduced within 60 days, we will have to initiate other actions or remedial measures. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

June 28, 2007

Paradise Mobile Home Park
Mr. Richard DeRuiter - OR CURRENT OWNER
1445 Hill Street
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - July 2007
Paradise Mobile Home Park**

Dear Mr. DeRuiter;

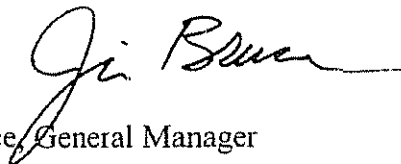
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month, the loss rate is 35%, which was a total un-billed and wasted water amount of 73,000 gallons, which is up about 3% from the prior month. This means that for every 100 gallons being delivered to your property, only 65 gallons are being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$540 per month in added water and sewer charges.

We again strongly suggest you take action immediately to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. If the amount is not reduced within 30 days, we will have to initiate other actions or remedial measures. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

June 28, 2007

Park Valley Mobile Home Park
Mr. Darrel Roppel - OR CURRENT OWNER
1674 S. Dixie Boulevard
Radcliff, KY 40160
CERTIFIED MAIL

**SUBJECT: Notice of Excessive Water Loss - July 2007
Park Valley Mobile Home Park**

Dear Mr. Roppel;

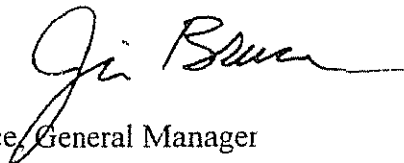
This letter is to notify you that excessive water loss continues to occur at your property. This is measured by comparing the water going through a calibrated master meter, and the water measured for the meters within the park at each lot.

For the most recent month of July, the loss rate is 921%, which was a total un-billed and wasted water amount of 129,000 gallons, which is up about 13% from the prior month. This means that there is almost 9 times more water being delivered to your park, than is actually being paid for. This loss to the District, and cost to produce and deliver this unnecessary water, is being paid by all of our other customers. This is caused by leaks within your private plumbing, within the park itself.

Our District is in the process of revising our tariff through the Public Service Commission. When approved, this change would require that park owners pay for all leaked water. At the current leak rate, this additional charge would add about \$955 per month in added water and sewer charges.

We again strongly suggest you take action immediately to begin making the needed repairs to your plumbing to reduce this water loss rate. We will continue to monitor the reduction in future months. If the amount is not reduced within 30 days, we will have to initiate other actions or remedial measures. We appreciate your action and response to this notice.

Sincerely,



Jim Bruce, General Manager

KENTUCKY MANUFACTURED HOUSING INSTITUTE

76 C Michael Davenport Blvd., Suite. 3 & 4 - Frankfort, KY 40601

502-223-0490 - 800-467-6590 - 502-223-7305 (FAX)

May 9, 2007

Mr. Bill Rissell, Chairman
Hardin County Water District #1 Commission
1400 Rogersville Road
Radcliff, KY 40160

Dear Chairman Rissell:

Thank you very much for your taking the time to personally call me in regard to the Kentucky Manufactured Housing Institute's land-lease communities' questions about the proposed tariff to be submitted by Hardin County Water District 1 to the Kentucky Public Service Commission.

Our members do appreciate the water district's need to address the water leakage problems. You can be assured that KMHI members want to correct this issue as well. Thanks for your explanation that the water district has no jurisdiction in the billing nor rate of fees charged for sewer service, and that the proposed tariff does not address sewage issues. The sewage cost will have to be reviewed as a separate issue

We will make a request for a copy of the proposed tariff as per the water district's policy. If our members have further concerns, we will address them through the state PSC public comment procedures.

Again, thank you and Mr. Jim Bruce for your response to our concerns.

Sincerely,



Thad I. Vann
Executive Director

cc: KMHI Community Division Members in Hardin County
Jim Bruce, Hardin County Water District 1

KENTUCKY MANUFACTURED HOUSING INSTITUTE

76 C Michael Davenport Blvd., Suite. 3 & 4 - Frankfort, KY 40601

502-223-0490 - 800-467-6590 - 502-223-7305 (FAX)

May 1, 2007

Bill Rissel, Chairman
Hardin County Water District 1 Commission
1400 Rogersville Road
Radcliff, KY 40160

Re: Approved Tariff Proposed to Kentucky PSC

Dear Chairman Rissel:

Manufactured home community owners and managers in Hardin County Water District 1 are very interested in the proposed tariff or public policy for water meter reading, and now including an apparent proposal to charge the communities (parks) with respect to sewer leaks.

We read the *News Enterprise* April 19, 2007 article which reported that the Hardin County Water District 1 Commission had approved a proposal to send to the Kentucky Public Service Commission. Based upon our reading of the article, it appears that the Commission has considered the concerns of the community operators and their residents with respect to allowing the continuance of the current water meter reading policy provided that the community agrees to the conditions as outlined, and that they agree to pay for the water and sewage losses through leakage.

The KMHI member communities are concerned about the proposed policy to also charge those facilities with the cost of sewage draining into the ground. According to the members KMHI and the newspaper, this sewage issue was not addressed previous to the commission meeting on April 17, 2007. Therefore, those affected, had no opportunity to express their concerns. The additional sewer leakage fee could be a substantial cost to housing affordability.

Simply stated, the newspaper report appears to indicate that the Commission's decision on the proposed water meter reading is a positive step and consistent with KMHI's recommendations. We do not know about the specific proposed language of the approved policy or the additional language about the sewage leakage run off charges.

I have requested a copy of the approved proposal prior to its being sent to the state Public Service Commission in a letter sent to Jim Bruce, general manager of Hardin County Water District 1. To date, we have not received a copy of that document. Without reading and understanding exactly what it states, your customers and our members cannot adequately respond to the district or to state PSC as allowed during the public comment period.

Enclosed is a copy of two letters we sent to Mr. Bruce and a copy of his reply to our request. Since the Commission has now approved the proposed tariff, we again request that the district staff provide KMHI a copy of the proposal as soon as possible.

KMHI does not expect any special treatment, but we do expect to be provided a copy of the proposal as requested. We are prepared to pay a reasonable cost of the printing and postage.

Thank you for your attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Thad I Vann". The signature is fluid and cursive, written in a professional style.

Thad I Vann
Executive Director

Enclosures

cc: KMHI Community members in Hardin County
Jim Bruce, General Manager, H.C.W.D. 1

TIV/mks

KENTUCKY MANUFACTURED HOUSING INSTITUTE

76 C Michael Davenport Blvd., Suite. 3 & 4 - Frankfort, KY 40601

502-223-0490 - 800-467-6590 - 502-223-7305 (FAX)

April 18, 2007

Jim Bruce
Hardin County Water District 1
1400 Rogersville Road
Radcliff, KY 40160

Reference:

Dear Mr. Bruce:

Thank you for your letter dated April 12, 2007 in response to our previous correspondence in regard to the status of Hardin County Water District 1 Commission's action on the proposed policy and regulation amendments for placement and reading of water meters in manufactured home land-lease communities.

Your letter stated that the commission had not finalized its proposed amendments; it was still in the process of studying the issue and had taken recommendations from the affected customers into consideration. Thank you for taking KMHI's proposed policy under advisement.

It appears that the commission has decided to develop its own policy, which it will approve for submission to the Kentucky Public Service Commission. We understand the procedures with respect to the public comment process before the PSC.

Your point about the water district following the statutory requirements for public meeting notices is well taken. We do not expect the water district to be selective with the notification procedure. We do appreciate the opportunity given to KMHI and its members to address the commission and its staff and to present our recommendation.

The issue that still is not answered to our satisfaction is the question of being given (or making available) the draft or "working" proposal that is being prepared for consideration by the commission. We suggest that the public will be better informed and prepared to comment if the proposed tariff is reviewed prior to approval.

Please advise me how to go about requesting a copy of the final draft proposal prior to its being considered by the Hardin County Water District 1 Commission.

Thanks again for taking the time to respond to our questions.

Sincerely,



Thad I. Vann
Executive Director

cc: KMHI Community Division Members in Hardin County

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

April 12, 2007

Mr. Thadd Vann
Executive Director
Kentucky Manufactured Housing Institute
76 C Michael Davenport Blvd, Suite 3 & 4
Frankfort, KY 40601

SUBJECT: Response to 4/5/07 Letter

Dear Mr. Vann

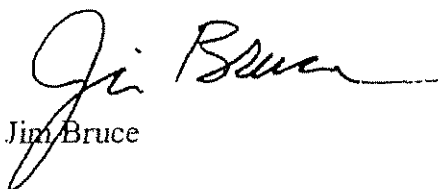
The District and its Board have received and been provided with your prior correspondence, and the proposal of KMHI, based in Frankfort, Kentucky. We have held two informal staff meetings, and two Board meetings, where interested property owners attended and were heard and participated in the discussion regarding proposed changes to our policies and regulations regarding placement and reading of water meters on private property.

Regarding the KMHI proposal, our Board has formulated its own policy that they believe is best for our 9,700 customers, and employees that have to read and access meters on a daily basis. We did provide two public comment periods for the fourteen persons that attended the February 20th Board meeting, and their comments were heard and considered by the Board. Regarding the availability of a policy document at that meeting, the Board had not completed their study of the proposed policy available as of that date.

We are still finalizing a proposed tariff to submit to the Public Service Commission (PSC), which is not yet complete, nor approved by the Board. It is the intention of the Board to finalize a proposed tariff change for submittal to the PSC in the near future. This type of filing will require local public notice. Any customers, or other parties recognized by the PSC as having standing in the case before them, will be allowed to comment or intervene during the case. We do not intend to make selective, or special notice to only a few persons or non-customers, but will follow the PSC regulations and statutes for this type of public notice and process.

We can also assure you that our Board has followed all statutory requirements for public meeting notices, and will continue to follow these requirements in the future regarding public notice and availability of public documents and records. We hope this answers your questions and issues raised in your prior correspondence.

Sincerely,



Mr. Jim Bruce

Cf; Mr. William Rissel, Chairman, HCWD1 Board of Commissioners
Mr. David Wilson, II, Attorney, HCWD1
Judge Executive Harry Berry, Hardin County Fiscal Court
Mr. Ken Howard, Hardin County Attorney

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April 5, 2007

Mr. Jim Bruce
Hardin County Water District #1
1400 Rogersville Road
Radcliff, KY 40160

Dear Mr. Bruce:

I am writing to you again on behalf of the Kentucky Manufactured Housing Institute's member land-lease communities (parks) located in Hardin County Water District #1.

To date, we have not received any response from the water district as requested in my letter to you dated February 20, 2007, the day that we understand, the commissioners considered the issue of water meter readings in manufactured home communities and the recommendations that KMHI members made in a statement dated September 6, 2006. A copy of that position statement is enclosed.

Reports from our members who did attend the February 20, 2007 meeting with the district commissioners, indicated that the commission has or will send a document to the Kentucky Public Service Commission for its approval. Further, we were told that the document was not available to those in attendance.

Our members, the commissioners present and your staff at a meeting held at your office on August 1, 2006 agreed to the proposed solution, in the form of the enclosed policy position on water meter reading, in principal. Subsequently it was put in writing on September 6, 2006 and forwarded to your office. On October 31, 2006, I wrote you a letter requesting the status of the proposed policy for water meter readings. We received no reply.

On February 20, 2007, I again wrote to you asking about the status of the matter in question and enclosed previous correspondence for your review. Still, we received no reply.

At this time, KMHI is again requesting the status of the association's proposal, any decisions made by the commissioners and a copy of any related documents submitted to or being prepared to submit to the Kentucky Public Service Commission.

We would greatly appreciate a response immediately. Our next option is to contact the Hardin County Water District #1 Commissioners directly with this request and the Hardin County Attorney's Office.

If you require an open records request, just let us know. We can follow that procedure, if necessary. We also will contact the state PSC and ask for any documents that Hardin County Water District #1 has submitted.

Mr. Bruce, KMHI members want to work with the water district officials and they have made a proposal, seemingly agreeable to all, in good faith. They deserve to know what the water district will do, or will not do.

Thank you for your consideration to respond to us immediately.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thad I. Vann".

Thad I. Vann
Executive Director

Cc: Nathan Smith, KMHI President
KMHI Member Communities in Hardin County
Dan Walton, KMHI Legal Counsel

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

March 26, 2007

Mr. Jeff Pitts
Property Manager - Dixie Mobile Home Park
REMAX / Executive Group
100 Chase Way, Suite 1
Elizabethtown, KY 42701

**SUBJECT: Water Service Termination - Extension
Dixie Mobile Home Park, Radcliff, Kentucky**

Dear Mr. Pitts;

As you know, we postponed any termination of service per your March 19, 2007 request. We have monitored the progress of our requirements for continued service, as outlined in our March 2, 2007 notice provided to your office, and State Resources.

It appears that you have corrected all of the water leaks, and they are now at an acceptable level. An account has also been opened for the master meter, by States Resources Bank.

The only requirement still outstanding is the repair of sewer leaks, and the affidavit from a licensed plumber stating that all sewer services have been repaired in accordance with plumbing codes. I have attached that code or requirement herein, so you can show it to your plumber and have them make repairs accordingly.

We appreciate your efforts to address these problems. However, we continue to be concerned that a health risk to the public water system still exists from sewer leaks still occurring. On March 21, we received more test results of fecal contaminated water at 10 locations within the park. One of these was taken inside a meter pit, in an occupied trailer, right next to what appears to be a disconnected sewer service line (lot 109).

Because of this clear and serious risk, we have notified the resident for lot 109 that we will be turning off his water service on Wednesday, at 8:00AM. This problem will need to be fixed, and a notice from a licensed plumber that the sewer leak repaired. We will also need to verify by site visit, or lab test, that the water near the meter pit is no longer contaminated.

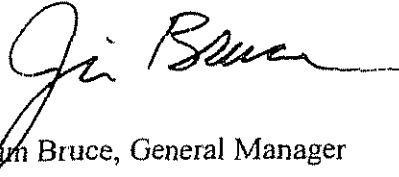
For the whole park, we will also request that all the sewer services and leaks be repaired, according to our March 2 notice, no later than April 6, 2007. If the sewer leaks have not been repaired, and we have certification by that date, we reserve the option to terminate water service to the property, until we are assured that the sewer leak issue has been resolved.

Mr. Jeff Pitts - Property Manager - Dixie Mobile Home Park
March 26, 2007

Water Service Termination - Extension - Dixie Mobile Home Park, Radcliff, Kentucky
Continued

We appreciate you addressing these remaining issues, and deadline. If you have any questions, please call us at 270-351-3222.

Sincerely,



Mr. Jim Bruce, General Manager

Cf; Lincoln Trail Health Department, Ms. Scotty Wheeling, FAX: 769-0471
States Resources Corporation, 4848 S. 131st Street, Omaha, NE 68137 (email)
City of Radcliff, Code Enforcement & Wastewater Departments
Kentucky Public Service Commission, Ms. Ginny Smith, FAX: 502-564-3460
Kentucky Environmental Protection Cabinet, Mr. Mike Mudd, FAX: 502-429-7125
Mr. David Wilson II, HCWD1 Attorney

Encl.

March 19, 2007

Hardin Co Water District, No. 1
Attn: General Manager

Dear Mr. Jim Bruce,

This letter is follow up on our recent conversations over the telephone. Initially we identified (11) eleven fresh water leaks at Dixie MHP. Brian Sapp of Wayne's Plumbing has corrected (10) ten of the initial eleven leaks as well as corrected the class III leak at the park residence. Brian explains that he believes there to be two remaining leaks that need to be fixed and he will correct them as soon as weather and field conditions permit.

With that being said, please grant an extension to correct the deficiencies noted in your letter dated March 1, 2007. As we spoke on the telephone once the fresh water leaks are isolated and corrected the remaining surface ground water should be waste water leaks. We will correct those leaks next.

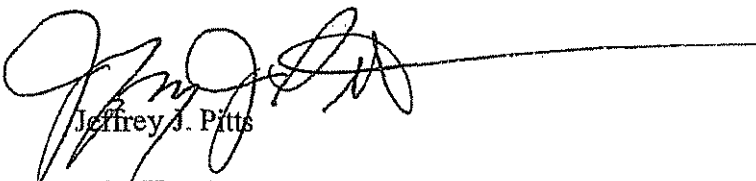
Furthermore; the park owners contact information is as follows:

States Resources
Ken Stutzman
Account Officer
800-279-8295 ext 115

Please contact them for their billing information regarding the master meter.

Thank you in advance for your consideration on this matter.

Sincerely,



Jeffrey J. Pitts

CC: Ken Stutzman

FAX TRANSMISSION

Hardin County Water District No. 1

1400 Rogersville Road
Radcliff, KY 40160
(270) 351-3222 FAX: (270) 352-3055
www.HCWD.com

TO: SCOTTY WHEELING DATE: 3.3-07
FAX Number: 769-0471
NUMBER OF PAGES (Including Cover): 6
FROM: JIM BRUCE
ORIGINAL TO FOLLOW IN MAIL: Yes No
SUBJECT: SPECIM CIRCUMSTANCE TURN-OFF NOTICE

COMMENTS:

This notice was provided to park owner (bank) and operators today. We will provide notice to park residents Monday. Also included lab test results. We think there are six residents / families still living in park, but are not positive.

Call if you have any questions

Jim Bruce

(Please call if you do not receive all of the pages)

THE DOCUMENTS ACCOMPANYING THIS TRANSMISSION ARE CONFIDENTIAL AND CONSIDERED LEGALLY PRIVILEGED. THIS INFORMATION IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. THE AUTHORIZED RECIPIENT OF THIS INFORMATION IS PROHIBITED FROM DISCLOSING THIS INFORMATION TO ANY OTHER PARTY UNLESS REQUIRED TO DO SO BY LAW OR REGULATION. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION, OR ACTION TAKEN IN RELIANCE ON THE CONTENTS OF THESE DOCUMENTS IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS INFORMATION IN ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY.

FAX TRANSMISSION

Hardin County Water District No. 1

1400 Rogersville Road
Radcliff, KY 40160
(270) 351-3222 FAX: (270) 352-3055
www.HCWD.com

TO: MIKE MURDID DATE: 3.3-07
FAX Number: 502-429-7125
NUMBER OF PAGES (Including Cover): 6
FROM: JIM BRUCE
ORIGINAL TO FOLLOW IN MAIL: Yes No
SUBJECT: SPECIAL CIRCUMSTANCE TURN-OFF NOTICE

COMMENTS:

This notice was provided to park owner (bank) and operators today. We will provide notice to park residents Monday. Also included lab test results. We think there are six residents / families still living in park, but are not positive.

Call if you have any questions

Jim Bruce

(Please call if you do not receive all of the pages)

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FAX TRANSMISSION

Hardin County Water District No. 1

1400 Rogersville Road
Radcliff, KY 40160
(270) 351-3222 FAX: (270) 352-3055
www.HCWD.com

TO: KATHY W, JULIA T, STEVE B

DATE: 3.3-07

FAX Number: _____

NUMBER OF PAGES (Including Cover): 6

FROM: JIM BRUCE

ORIGINAL TO FOLLOW IN MAIL: Yes No

SUBJECT: SPECIM CIRCUMSTANCE TURN-OFF NOTICE

PLEASE DIST
COPIES TO
EACH

COMMENTS:

This notice was provided to park owner (bank) and operators today. We will provide notice to park residents Monday. Also included lab test results. We think there are six residents / families still living in park, but are not positive.

Call if you have any questions

Jim Bruce

(Please call if you do not receive all of the pages)

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FAX TRANSMISSION

Hardin County Water District No. 1

1400 Rogersville Road
Radcliff, KY 40160
(270) 351-3222 FAX: (270) 352-3055
www.HCWD.com

TO: DAVID WILSON DATE: 3.3-07
FAX Number: _____
NUMBER OF PAGES (Including Cover): 6
FROM: JIM BRUCE
ORIGINAL TO FOLLOW IN MAIL: Yes No
SUBJECT: SPECIAL CIRCUMSTANCE TURN-OFF NOTICE

COMMENTS:

This notice was provided to park owner (bank) and operators today. We will provide notice to park residents Monday. Also included lab test results. We think there are six residents / families still living in park, but are not positive.

Call if you have any questions

Jim Bruce

(Please call if you do not receive all of the pages)

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FAX TRANSMISSION

Hardin County Water District No. 1

1400 Rogersville Road
Radcliff, KY 40160
(270) 351-3222 FAX: (270) 352-3055
www.HCWD.com

TO: GINNY SMITH - 15025643460 DATE: 3.3-07
FAX Number: 502-564-3460
NUMBER OF PAGES (Including Cover): 6
FROM: JIM BRUCE
ORIGINAL TO FOLLOW IN MAIL: Yes No
SUBJECT: SPECIM CIRCUMSTANCE TURN-OFF NOTICE

COMMENTS:

This notice was provided to park owner (bank) and operators today. We will provide notice to park residents Monday. Also included lab test results. We think there are six residents / families still living in park, but are not positive.

Call if you have any questions

Jim Bruce

(Please call if you do not receive all of the pages)

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Jim Bruce

From: Jim Bruce
Sent: Friday, March 02, 2007 10:19 AM
To: Bill Rissel (wjrisse1@fortknoxfcu.net); John Tindall (Wwjtin@aol.com); Ron Hockman (hockman@bbtel.com); William Gossett (gompa@aol.com); sgmprs@insightbb.com; 'David Wilson, SBW'
Subject: KMHI Letter

Board;

Here is recent letter from Mr Vann with KMHI. Previous correspondence from his was provided to Board by email on Aug 15, 2006, and again with Board packet of Nov 21, 2006 (pgs 63-67)

FYI

Jim Bruce

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

March 1, 2007

Mr. Sands Chewning
Chewning & Chewning Law Firm
603 South Main Street
Hopkinsville, KY 42241
(See Distribution List at bottom)

**SUBJECT: Water Service Termination
Dixie Mobile Home Park, Radcliff, Kentucky**

Dear Mr. Chewning;

It is our understanding that you are the owner or manager of record for the Dixie Mobile Home Park in Radcliff, Kentucky. This letter is to provide you advance notice (as required by 807 KAR 5:006, Section 13 & 14) that water service will be terminated to the park at 9:00 AM on March 20, 2007 for the following reasons;

1. Recent surface excavation and removal of approximately 70 previous mobile homes / lots at the park have left numerous and extensive water leaks within the park, which water is not being paid for. Our most recent measurement, through the master water meter (tested in accordance with 807 KAR 5:066, Section 16) showed water going into the park at a rate of 934,000 gallons per month. This means that only about 5% of the water being provided to this property is being paid for and 95% is not being billed or accounted for.
2. There is evidence of fecal coliform on the ground which could mix with water in potable water meter pits. This has been confirmed by 10 recent samples taken throughout the park, and tested by a certified laboratory. A public water utility in Kentucky is responsible to the public and other water customers to make sure a cross contamination risk cannot occur (807 KAR 5:066, Section 3, b and District's tariff Sheet No. 7, A.11 and 401 KAR 8:020, Section 2.[2]) and that unsanitary or dangerous conditions do not exist. The sanitary conditions and raw sewage within the park cause us to be concerned that a cross connection, and dangerous conditions, most likely exist, from the old and open pipes within the meter setters that have been damaged or are now underground or open to groundwater.
3. Most of the approximately 70 sites where trailers have been removed, have had the meter setter (copper pipe that holds water meter in place) and meter pit damaged. The District's tariff (Sheet No. 7, A.3 and A.4) does not allow new meters to be located on private property. Any future trailers placed and water used at these lots will be billed through the existing master meter.

Mr. Sands Chewing
Chewing & Chewing Law Firm

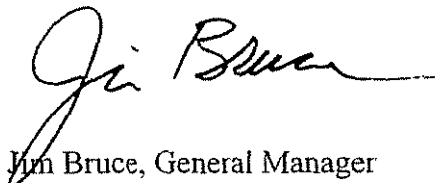
SUBJECT: Water Service Termination
Dixie Mobile Home Park, Radcliff, Kentucky

We have also directly notified the residents of the park of this date and scheduled turn off, so they can make other living arrangements. Water service can be restored to this property after the following occur;

1. A new customer account with responsible paying party is established for the master meter. This would include payment of a deposit and other new account information provided.
2. The leaks within the park are repaired or minimized to no more than 15% than used for domestic service within the park (807 KAR 5:066, Section 6, [3]). Based on our February readings, that would mean the leak rate would have to be reduced to 6,900 gallons per month or less, from the current 934,000 gallons per month (current unaccounted for loss rate is 2,045% or 20 times more than accounted for water). After water service is established and billed through the master meter, all leaked water would be included in the monthly water and sewer bill, so it will be to the owner/manager's benefit to repair the leaks.
3. We will require a certification or affidavit letter from a licensed plumber that all old meter setters and service lines have been sealed off or isolated from the main park potable water plumbing that feeds existing trailers or residents. The letter shall also confirm that sewer lines, clean-outs and services within the park, for existing and future trailers, have been repaired and comply with KRS 318.130. This requirement is to assure that the cross connection risk has been eliminated, and other state and local codes are brought in compliance (807 KAR 5:006, Section 14, [e]).

If you have any questions, please call us at 270-351-3222.

Sincerely,



Mr. Jim Bruce, General Manager

Cf; Lincoln Trail Health Department, Ms. Scotty Wheeling, FAX: 769-0471
Executive Group, Property Management, 826 S. Dixie, Radcliff, KY. 40160
States Resources Corporation, 4848 S. 131st Street, Omaha, NE 68137
City of Radcliff, Code Enforcement & Wastewater Departments
Kentucky Public Service Commission, Ms. Ginny Smith, FAX: 502-564-3460
Kentucky Environmental Protection Cabinet, Mr. Mike Mudd, FAX: 502-429-7125
Mr. David Wilson II, HCWD1 Attorney

KENTUCKY MANUFACTURED HOUSING INSTITUTE

76 C Michael Davenport Blvd., Suite. 3 & 4 - Frankfort, KY 40601

502-223-0490 - 800-467-6590 - 502-223-7305 (FAX)

February 26, 2007

Mr. Bill Rissell, Chairman
Hardin County Water District #1 Commission
1400 Rogersville Road
Radcliff, KY 40160

Reference: Manufactured Home Community Water Metering

Dear Mr. Rissell:

Attached is a copy of a letter dated February 20, 2007 that the Kentucky Manufactured Housing Institute sent to Jim Bruce at the Hardin County Water District #1 on behalf of its members. The letter addresses a reasonable resolution to the matter of reading the water meters in manufactured home land-lease communities in your water district.

The purpose of this letter is to provide you and other commissioners with the attachments supporting the local members request to be heard on the most recent proposal and to be provided a copy for review prior to the commission taking action.

KMHI members who attended the February 20, 2007 regular meeting of the Hardin County Water District #1 Commission, advised me that the commission did discuss the issue of reading water meters in the communities, but those in attendance were not provided a copy of the latest proposal recommended by the district staff, nor were those affected provided a chance to interact with the commissioners on the specific concerns

KMHI members have expressed much concern about language that defines the term "major renovation" and the interpretation of how the proposed regulation will be applied.

Our members said that they were told at the meeting that they could request a copy of the minutes of the February 20 meeting

Therefore, please accept this correspondence as a request to provide each community manager/owner and me a copy of any proposal that is being considered along with a copy of the February 20 meeting minutes. We ask that the commission delay any final action on the issue until the local members can address their remaining concerns.

We respectfully request your prompt response to this important matter. We are working in good faith and in the best interest of manufactured home communities and their residents.

Sincerely,



Thad I. Vann
Executive Director

Attachments

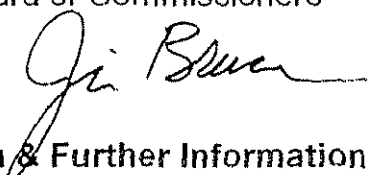
cc: Jim Bruce, Hardin County Water District #1

Rebecca Arthur
"THE VOICE OF THE MANUFACTURED AND MODULAR HOME INDUSTRY IN KENTUCKY"

MEMORANDUM
Hardin County Water District No. 1

DATE: February 19, 2007

TO: HCWD1 Board of Commissioners

FROM: Jim Bruce 

SUBJECT: Explanation & Further Information Regarding Master Meter Recommendation, February 20, 2007 Board Meeting

I would like to provide further explanation and justification for the staff recommendation on Master Metering of Trailer Parks, as included in the February 20, 2007 Board Packet. The main topics and reasons for my recommendation are;

1. Initial Change from Master Meters to lot meters: Our past research, confirmed by our meeting with PSC staff, found that the change made from master meters to individual lot meters was done in the mid, 1980's, without any change to the District's tariff or billing policies, nor PSC approval of same. This affected several thousand park residents, who were forced to open an account, and pay a deposit, without any choice or chance to comment on what should have been a major customer billing change, requiring public notice and PSC approval. I have heard anecdotally from some of our employees, that they recall when this change was made and many renters came to District offices, upset that the District manager and park owners made this change without telling them, or without their input or advance notice.
2. Compliance with PSC and District tariff and Regulations: The proposed change complies with and is consistent with 807 KAR 5.066, Section 12.1.b (*... the customers point of service shall be located at that point on or near the street right of way or property line most accessible to the utility from its distribution system*). This regulation was also noted to District staff in a letter dated April 1, 1991 from the PSC. It is also consistent with the District's own tariff, approved by the Board and by PSC on October 1, 2000. Since then, there have been a few trailer parks which have been proposed, or closed and were then re-developed, and we required new meters to be placed according to the KAR and our tariff.
3. Recognition and precedent of private nature of location of current meters: In the 12 years I have worked here, and before then, all park owners have maintained and repaired the water mains within their park, and in fact, have installed these lot meters at their expense. This practice continues to this day. This recognizes that these meters have been installed within private property, and have been treated differently than all other meters the District owns and maintains. All other customers who have leaks within their private plumbing, are responsible for the cost of water being leaked. This is not the case with trailer parks who have never had to pay for leaked water within their plumbing or mains.

Explanation & Further Information Regarding Master Meter Recommendation

4. Liability to District accessing current meter locations: As our past presentations have documented, we have found more than one instance where fecal or e.coli bacteria was present in water that had filled meter pits, as a result of raw sewage and drain leaks under trailers. Our employees often have to remove meters (for service or non-payment), or pump out water to access a meter, where they encounter contaminated water. My first encounter with this problem occurred over 10 years ago, where several customers at the same park called about getting sick and having diarrhea. When I went to the park to investigate, I found raw sewage running across and between trailers within the park, and several meter pits filled with this water. We notified the health department, who issued a warning to the park owner, who fixed the leak. As long as we have meter setters which sometimes have to have open pipes in the meter pit, or employees having to come in contact with this water, I believe the District risks a potential liability both from a park resident, and an employee, and believe I would not be doing my duty as General Manager to not make this risk known to the Board.

5. Expense to District to leave as-is: The comparison of the four options clearly shows the cost to the District and its customers of the status quo option. The minimum savings to the District and its customers, in today's present value, by switching one of the other options is almost \$700,000. This assumes only 25% of the latest leaked water is actually billed. Using the January 2007 leaked and un-billed amount (3,826,400 gallons) would make the savings \$2,500,000 (present value) over the 10 years. While we cannot know exactly how much the leaks will be reduced, and actual future revenue received, if park owners had to pay for the value of the water and sewer, it is a substantial amount currently being un-billed and collected. If we were to only bill those parks with the largest leaks, we would need to continue to read and bill all park master meters, because new leaks could begin in the future at those that may not currently have leaks

6. Reduction of service turn-off's and impact to customers: In 2006, we had to turn off 398 customers within trailer parks for non-payment. Moving to master meter billing, would have eliminated all of these. While there would be a corresponding loss of turn-off fee revenue, there is also a decrease in the labor, equipment and time required to turn off this many customers. Non-payment turn off's are the most stressful transaction between the District and its customers. Often, the customer is angry and frustrated, having had their water service interrupted, and at times takes this out on the employee when coming in the pay their bill, plus the \$37 reconnect fee.

Billing the park directly, I believe, would reduce or eliminate most of these turn off's. While there is some risk that a park owner would not pay their water bill, most park owners would recognize that to retain renters, in a competitive market, they would want to make sure water service is not interrupted. My proposed tariff also provides an added time for park owners to pay a delinquent bill, to help avoid service interruptions. As master meter billings is quite common in most other locales, it is rare

February 19, 2007 - Continued
MEMO TO: HCWD1 Board of Commissioners
From: Jim Bruce, HCWD1 General Manager

Explanation & Further Information Regarding Master Meter Recommendation

for a whole park to be turned off for non-payment, as park owners are also business people and would see the impact this could have to their renters, and keeping their park at maximum occupancy

7. Non-standard method of water meters located within trailer parks: Placing and reading water meters within private parks is also not the water utility standard. HCWD2 uses master meters for 45% of their parks, however most with individual meters are where the lot fronts a public road, so the meter is not on private property. Louisville Water uses master metering for all trailer parks. The City of Elizabethtown also master meters all their large trailer parks. Only a few with less than 10 lots have individual meters. A drive yesterday to nine trailer parks between Radcliff and Elizabethtown, on Wilson and 31W, and to Muldraugh, found 7 of 9 trailer parks (78%) had master water meters installed for billing.

There is a national, income property support group, known as the National Submetering & Utility Allocation Association (NSUAA) which has been created solely to help property owners to read and allocate their utility costs and sub-meters to renters or tenants. There are also numerous meter reading companies, who will read and bill sub-metered accounts for property owners.

Finally, I would respectfully request that the Board make a final decision on this topic, even if that is to leave the status quo. This topic has required more hours of mine and our staff's time, than any other single topic in the twelve years I have been manager. It has touched almost every employee, in one way or another.

To continue to compare the monthly individual lot meter use to master meters, requires several hours a month, from our Billing Specialist, who already is pressed to get all our bills calculated and mailed within strict deadlines. This process requires matching the latest use amounts from almost 900 accounts, to the master meter for 28 parks, and manually subtract the difference. Our Field Service Rep's, also on tight deadlines, also are reading the additional 30-40 master meters. We have already spent several thousand dollars upgrading and re-calibrating all the master meters, to begin doing the monthly reading.

I am sure that park owners would like to know if anything will change, or if the status quo will be maintained. If staff's recommendation were to be accepted. I appreciate your taking the time to review and study this topic at this meeting, and the seven other Board meetings where this topic has been discussed

Thank You

10 ar Cost Benefit Comparison

For alternatives to Trailer Park - Master Metering

	Ann Chg %	# Recurrence	Leave As-Is A	Staff Recomm B	Bill leaked C	Attrition convert D
Outflows:						
Purchase AMR Meters	0.0%	1	-\$223,642	\$0	-\$223,642	-\$136,296
Cost of Funds / AMR Meters	4.0%	10	-\$109,771	\$0	-\$109,771	-\$5,452
Value Treating Leaked Water	4.0%	10	-\$39,771	\$0	\$0	\$0
Unbilled water	4.0%	10	-\$488,926	\$0	-\$180,700	-\$47,648
Cost doing Turn-offs	4.0%	10	-\$180,700	-\$5,000	-\$5,000	-\$5,000
PSC Filing / Case	0.0%	1	\$0	-\$321	-\$114,694	-\$30,243
Depreciation Exp (Meters)	4.0%	10	-\$114,694	-\$5,321	-\$633,807	-\$224,638
TOTAL Over 10 Years >			-\$1,157,504	-\$5,321	-\$633,807	-\$224,638
Inflows:						
Billed leak water	0.0%	10	\$0	\$488,926	\$488,926	\$488,926
Indiv meter charges	2.5%	10	\$541,798	\$87,259	\$629,058	\$230,122
Turn Off Fee Revenue	1.0%	10	\$147,813	\$0	\$147,813	\$38,976
TOTAL Over 10 Years >			\$689,612	\$576,185	\$1,265,797	\$758,024
Net Total Over Period >			-\$467,892	\$570,864	\$631,990	\$533,386
Net Present Value >			-\$313,846	\$382,916	\$423,918	\$357,777
Compared to As-Is >				\$696,762	\$737,764	\$671,623

NOTE: Value of unbilled water for January 07 was \$150,980 using 3,860,000 gallons. Amount used in analysis assumes leaks reduced by 75% when billing begins.

KENTUCKY MANUFACTURED HOUSING INSTITUTE

76 C Michael Davenport Blvd., Suite. 3 & 4 - Frankfort, KY 40601

502-223-0490 - 800-467-6590 - 502-223-7305 (FAX)

October 31, 2006

Jim Bruce, Manager
Hardin County Water District #1
1400 Rogersville Road
Radcliff, KY 40160

Re: Proposed Policy for Water Meter Readings

Dear Mr. Bruce:

The members of the Kentucky Manufactured Housing Institute located in Hardin County Water District I requested that I contact you in regard to the status of the recommendation discussed at the meeting in your office on August 1, 2006.

One of our members provided me a copy of a survey, a copy of which is enclosed. I assume that it came from Hardin County Water 1. Some community (park) managers received a copy and some did not. It appears that the survey is relative to the discussions at the meeting on August 1st.

What is the purpose of the survey? Who initiated it and to whom was it sent? We hope those that received the survey will respond by November 8, 2006 deadline as requested. However, those not present at the meeting may have no clue as to what the survey is about.

Have the Hardin County Water District 1 commissioners considered the recommendation KMHI made at the meeting and in my correspondence to your office dated September 6, 2006. If so, what was the decision?

Our association members have made an effort to work with the water district in the best interest of all parties involved. They remain committed to finding a reasonable and mutually agreeable solution. However, we are disappointed that the survey was sent out without consultation with the community operators or the KMHI.

Could you please help us understand what the water district intends to do? Our members need to know if any follow-up to their recommendation will be considered.

Thank you for your attention to this request for clarification and information. We will be happy to meet and discuss this further if you want.

Sincerely,

A handwritten signature in black ink, appearing to read "Thad I. Vann". The signature is fluid and cursive, with a large initial "T" and a long, sweeping underline.

Thad I. Vann
Executive Director

Attachments

cc: Nathan Smith, KMHI President
Communities Owners in Hardin County Water District 1
Don Case, Triangle Manufactured Homes, Park and Service

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

October 17, 2006

1170 Waterfield
C/O Williams J. Sommerfield
OR CURRENT PROPERTY OWNER
2771 Centerpoint Rd.
Sonora, KY 427766

(SENT TO ALL MHC OWNERS)

SUBJECT: Mobile Home Park Water Metering Survey

Dear Williams J. Sommerfield;

The District has been studying different ways to bill water use for mobile home parks in Radcliff. All the parks at one time were billed through a single master meter. Some time in the 1980's, parks were allowed to have individual meters installed at each lot, within the private property of the park.

There are numerous problems that has caused us to look at changing the metering method. One is the amount of water being lost through the private water lines within the parks. This water loss is not metered or paid for, and is counted against the District's annual water loss or unaccounted for water amounts. Many trailers over the years have been moved or relocated too close or over the water meter. Some renters have built decks or dog fences over the meters, again making them hard to access for maintenance or reading.

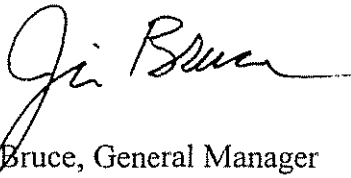
Also, we have had numerous instances where a sewer leak was not repaired, allowing raw sewage to collect inside the water meter pit. This creates a health hazard and risk to those within the park, and a cross connection risk to all our customers. It also is a health risk to our employees who may have to read the meter, or turn it off.

We have had several meetings with interested parties, and the Public Service Commission staff. Our Board has asked that we mail this survey to park owners, to measure your interest in possible solutions or changes. No final decisions have been made, and the questions do not indicate a final position or change that has been approved. Please take a few minutes to answer the questions, and return to us in the pre-addressed envelope. We expect to have a formal public meeting in the future, to review proposed changes. That meeting notice must be posted in the local newspaper.

IT IS VERY IMPORTANT THAT YOU ACTIVELY PARTICIPATE IN THIS SURVEY SO WE KNOW YOUR PREFERENCE, AND ANY IDEAS YOU MIGHT HAVE TO SOLVE THESE PROBLEMS.

We appreciate it very much if you can return the enclosed survey form no later than November 8, 2006. If you have any questions, please feel free to call.

Thank You



Jim Bruce, General Manager

Please check YES or NO to the questions below. Blank lines are also provided for your suggestions or comments. Please fold and tape the survey and return in the mail. PLEASE RETURN BY NOVEMBER 8, 2006.

HCWD-101706/18

- | | | | |
|---------------------------------|--------------------------------|----|---|
| YES
<input type="checkbox"/> | NO
<input type="checkbox"/> | 1 | I would be willing to pay for any water leaks in the private park plumbing or mains (not owned by District), between the master meter and individual lot meters (water leaked within a trailer would still be paid for by the renter or account holder) |
| YES
<input type="checkbox"/> | NO
<input type="checkbox"/> | 2. | I would be willing to pay for the cost to move any meter that is located under the trailer, deck or within fencing |
| YES
<input type="checkbox"/> | NO
<input type="checkbox"/> | 3. | I would be willing to pay for an automatic, radio read meter so the District does not have to open the meter pit to read the meter (current cost of these meters are \$153 each) |
| YES
<input type="checkbox"/> | NO
<input type="checkbox"/> | 4. | I believe that the District should take over responsibility to fix and maintain the private water mains within the park, if I paid for replacing or upgrading the mains to public water system standards |
| YES
<input type="checkbox"/> | NO
<input type="checkbox"/> | 5 | I would be willing to provide the District information about new renters immediately after a renter changes, so that they can make sure a new account is opened at that address or lot |
| YES
<input type="checkbox"/> | NO
<input type="checkbox"/> | 6. | I would agree to allow the District to turn off water at a lot where sewer water is found in or surrounding the meter pit, until I make repairs to the sewer line, and remove and disinfect the contaminated water from the meter pit |
| YES
<input type="checkbox"/> | NO
<input type="checkbox"/> | 7. | I do not think the District should make any changes to how water is now billed in mobile home parks in Radcliff |
| YES
<input type="checkbox"/> | NO
<input type="checkbox"/> | 8 | I would agree to allow the District to begin billing the park for all water use through the master meter, and I will take responsibility to read the meters and bill renters within the park directly, if the District gave the existing meters to me |

Other Comments or suggestions: _____

Park Name / Owner Name (Optional): _____

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502-223-0490 - 800-467-6590 - 502-223-7305 (FAX)

September 6, 2006

Jim Bruce, Manager
Hardin County Water District #1
1400 Rogersville Road
Radcliff, KY 40160

Re: Proposed Policy for Water Meter Readings

Dear Mr. Bruce:

Thank you again for working with the Kentucky Manufactured Housing Institute and many of the manufactured home land-lease communities (parks), located in Hardin County Water District 1, to help resolve the perceived water loss and safety issues within the communities.

The members of the KMHI and other community owners respectfully recommend that the Hardin County Water District 1 Commission consider approval of a policy that would allow the continuation of reading individual water meters at the community residents' homes provided the community (park) and the water district staff and commissioners agree to reasonable standards.

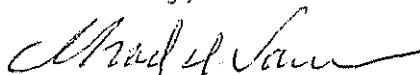
Attached is the proposed policy position that we are recommending to your staff and the commissioners. This is very much like the proposed draft I sent to you and the communities owners for review. We received some requested changes to language which are incorporated in this proposal.

There were no negative responses from the community owners, so as far as I know, there is consensus.

Please review this proposal and let me know what you think. The community owners request that consideration of this proposed policy be placed on the agenda for the next Hardin County Water District 1 Commission meeting.

Thank you for your consideration of this request.

Sincerely,



Thad I. Vann
Executive Director

Attachments

cc: Nathan Smith, KMHI President
Communities Owners in Hardin County Water District 1
Don Case, Triangle Manufactured Homes, Park and Service

Kentucky Manufactured Housing Institute

*Proposed Policy Position
For Manufactured Home Communities
Served by Hardin County Water
District 1, Ratcliff, KY*

September 6, 2006

Proposed for Consideration

KMHI General Position Statement: The KMHI is pleased to help propose a solution to the problems of water loss, safety on private property for meter readers and to urge the water district to continue reading individual meters. We understand that Hardin County Water District 1 plans to upgrade water meters and add remote sensors for reading water usage at the district's expense within the next few years. This will ease much of the monthly meter reader personnel issues.

With respect to the issue of water loss, the persons attending the August 1, 2006 meeting with Water District 1 agreed to the following in principal:

Proposed Position:

That the Hardin County Water District 1 continues to read the individual water meters in the communities, not just the master meters, provided the community agrees that:

1. Although, the water district is responsible for reading the master and all individual water meters, the community operator agrees to work with the water district to compare the total community water usage registered by the master meter against the combined usage registered by all individual water meters.
2. Community is responsible for any repairs and retrofits to the water lines from the master meter to individual meters and for the entire system including sewer within the boundaries of the community.
3. Water District 1 will assist the community to determine any individual resident water line loss and suspected theft of water.
4. Community will strictly enforce its resident regulations and/or lease agreement provisions with respect to water/sewer usage, public safety, animal control, etc.

Note: This proposed language is subject to agreement by the affected communities, Hardin County Water District 1 staff and Commissioners.

Jim Bruce

From: Jim Bruce
Sent: Tuesday, August 15, 2006 3:12 PM
To: 'Bill Rissel (E-mail)'; 'Jim Bruce (E-mail 2)'; 'John Tindall (E-mail)'; 'Les (Leslie) Powers SGM Retired (sgmprs@insightbb.com)'; 'Ron Hockman (E-mail)'; 'SBW David T. Wilson (E-mail)'; 'William Gossett (E-mail)'
Cc: Brett Pyles
Subject: KMHI Follow-up

Board;

Attached is correspondence from Mr. Thadd Vann, Exec. Dir. of the Kentucky Manufactured Housing Institute (KMHI). He attended our most recent meeting on 9/1. From what I understand, one of the park owners is a member of the KMHI, and had invited him to the meeting (we did not call to invite him).

This is his interpretation of what was said or committed to by the District. We are formulating our final staff recommendation and policy and will have ready for the Sept. Board meeting. Please call if you have any questions.

Jim

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76 C Michael Davenport Blvd., Suite. 3 & 4 - Frankfort, KY 40601

502-223-0490 - 800-467-6590 - 502-223-7305 (FAX)

August 10, 2006

Jim Bruce, Manager
Hardin County Water District 1
1400 Rogersville Road
Radcliff, KY 40160

Dear Mr. Bruce:

Thank you for meeting with local area land-lease communities in an effort to resolve water meter reading problems.

Enclosed is a copy of the recent memorandum and proposed draft policy position sent to the manufactured home land-lease communities in Hardin County Water District 1.

We invite your comments along with those of the community owners and managers. Upon receipt of the comments, we will draft a final proposal to send to you for staff and water district commission review.

Thanks again for allowing KMHI to assist in your efforts to adopt a reasonable policy.

Sincerely,



Thad I Vann
Executive Director

TIV/mkh

KENTUCKY MANUFACTURED HOUSING INSTITUTE

76 C Michael Davenport Blvd., Suite. 3 & 4 - Frankfort, KY 40601

502-223-0490 - 800-467-6590 - 502-223-7305 (FAX)

Date: August 9, 2006

To: Land-Lease Community Owners/Managers
Hardin County Water District 1

From: Thad I. Vann 
Executive Director, Kentucky Manufactured Housing Institute

Subj: Meeting with Hardin County Water District 1 and Proposed Industry Position

At the request of Kentucky Manufactured Housing Institute land-lease community (park) members, I attended a meeting between several communities and officials from the Hardin County Water District 1 in Ratcliff on August 1, 2006. The purpose of the meeting was to help resolve the problems claimed by the water district in regard to water leakage, sewer, and reading of only master meters instead of continuing to read individual meters and protection of meter reader personnel when on private property.

KMHI was asked by both its members and the water district manager Jim Bruce to intervene in order to help draft a reasonable and fair policy position to address these issues. Owners and managers of eight communities and two Hardin County Water District 1 staff personnel and two water district commissioners met. Since there are over fifteen other communities involved which did not attend, KMHI wanted to advise you of this meeting.

A general consensus was reached at the meeting that in principal, the water district would continue to read individual water meters on the homes within each community that agreed to the attached proposed policy position subject to your review and comment and submission of a final draft proposal for water district staff review and approval by the Hardin County Water District 1 Commission.

Please review the attachment and send KMHI your written comments, suggested changes or approval via Fax at (502) 223-7305, email at KMHI@KMHI.org or by mail at 76 C. Michael Davenport Blvd., Suite 3, Frankfort, KY 40601.

We told the water district that we would try to give them a final proposal within the next 15 days, so please respond no later than August 18, 2006. Thank you for your attention to this matter.

cc:

Attachment
TIV/mks

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

July 10, 2006

Mr. Donald Case
Homestead M.H.C. / Yarwood M.H.P.
406 North Street
Radcliff, KY 40160

SUBJECT: Response to July 3 2006 Letter - Questionnaire

Dear Mr. Case;

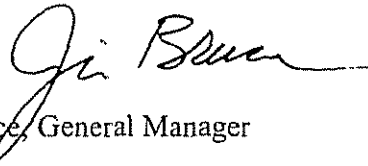
I received your letter and questionnaire. I will also forward the letters to Board members to their home address, as we only meet once or twice a month. The answers to your questionnaire are also enclosed.

On the advance notice for a future staff meeting, I will do my best to provide Ms. Arthur ten days notice. I know the last meeting was a short advance notice. Any future Board meeting on the topic requires specific public notice under state statutes, which we need to follow, and would not include specific invitations to selected customers or persons. We have told park owners in past that our regular meeting is the third Tuesday of each month, and they are welcome to call the Friday before to see what is on the agenda. Each Board meeting also includes a time for public comment, so anyone can come to any meeting to address the Board if they like.

Ms. Arthur had come in several months ago to let us know Mr. Peake was no longer employed, and to contact her. We did call her to invite her to the last informal staff meeting, and will notify her again of any future staff meeting. We cannot ask all Board members to come to the next staff meeting, as this would result in a quorum of the Board, requiring public notice and also be considered a special meeting. I will ask our Chairman, or another Board member if he cannot attend, to come to the next staff meeting with park owners, so they can observe the meeting and share their observations at any future Board meeting where this topic is on the agenda.

We appreciate your interest in this topic. We are interested in park owners input, as well as how this issue affects all our other customers, our employees and the public in general. Please feel free to call me anytime for an update, or if you have any questions.

Sincerely,



Jim Bruce, General Manager

Cf; Mr. William Rissel, Chairman, HCWD1
HCWD Board of Commissioners
Ms. Charlene Easter, HCWD1 Customer Service Manager

Encl.

**HOMESTEAD M.H.C./YARWOOD M.H.P.
406 NORTH STREET
RADCLIFF, KY 40160
PHONE (270) 351-1376
FAX (270) 351-3292**

July 5, 2006

Bill Rissel, Commissioner
C/O Hardin County Water District #1
1400 Rogersville Road
Radcliff, KY 40160

Dear Mr. Rissel:

**PROPOSED CHANGES IN WATER METER READING FOR MOBILE HOME
COMMUNITIES**

I have a great concern. It sounds to me like there are a lot of problems in the Water District. Mr. Bruce made a statement that sounded very discriminatory. The statement was that the people in mobile home parks were the ones stealing water. There did not seem to be too much concern about the water that is being stolen that is not in mobile home parks. I would think that you would have every neighborhood master metered so that you would know what the water loss is.

I have been investing in real estate for 47 years. I have purchased and sold hundreds of pieces of property and I have found that many of these homes not only had the water jumped out, but also where they had dug behind the meter toward the street to put in a bypass line which they were using to water lawns, wash cars, landscape, fill swimming pools, etc. The bypasses had been there for years. I also found this in relatively new homes that were installed when the houses were built and the water lines run.

I have also purchased homes where electric had been bypassed so they were obtaining free electric service. Many of these homes are in the better and exclusive neighborhoods around Northern Kentucky and Cincinnati. We just had a case in Northern Kentucky in the past few years in an exclusive neighborhood where the owner of the property had the electric meter bypassed at the time the house was built in order to heat a swimming pool and hot tub year round. Yes the gas and electric company charged them many, many months of electric service.

We installed water meters in Homestead Mobile Home Community at the cost of several hundred dollars per meter. The Water Department required that we purchase the meters, setters and boxes from them when we could have purchased them on the open market for approximately 33% less than we paid the Water District.

My representative at the last meeting held by Mr. Bruce informed me that they felt that the Water District believed that only poor people steal water and that there is no problem any where else. Without neighborhood master meters, I don't know how they could tell. It also gave my representative at the meeting the impression that people in mobile home parks are the only ones who obtain water illegally.

We feel that the Water Department is targeting only mobile home parks and trying to lump the good with the bad. We invite you to come over and inspect our parks. We offer all agencies full cooperation. We check our tenants out thoroughly before we rent to them to see if they have criminal histories or sex offender charges. As far as we have been able to determine, the Water Department does nothing like this. They do not report people who do not pay water bills to the Credit Bureaus. People who do not pay their water bills should not be able to have their water turned back on until their bills are paid. We have never found anything on anyone's credit report about any water bills.

I am enclosing a copy of a letter and some questions for Mr. Bruce. I would like you to be aware of where we stand. In addition, I would like to respectfully request your presence during the next meeting on this issue.

Sincerely,

Donald Case, Owner
Homestead and Yarwood
Mobile Home Parks

Enclosure: Letter to Mr. Bruce with Questions

C Thad Vann, Executive Director
Kentucky Manufactured Housing Institute

**HOMESTEAD M.H.C./YARWOOD M.H.P.
406 NORTH STREET
RADCLIFF, KY 40160
PHONE (270) 351-1376
FAX (270) 351-3292**

July 3, 2006

Jim Bruce, Manager
Hardin County Water District #1
1400 Rogersville Road
Radcliff, KY 40160

Dear Mr. Bruce:

**PROPOSED CHANGES IN WATER METER READING FOR MOBILE HOME
COMMUNITIES**

My first concern is that I would greatly appreciate at least a ten day notice of any future meetings held on this subject. I do not live locally and cannot be in Radcliff at a moments notice. Ron Peake is no longer with my company. Please direct any information to either Rebecca Arthur or Jerry Nickeson; either of which can be reached at our office number or on their cell phones Rebecca-859-250-9436 and Jerry-440-320-3192. If neither can be reached in person, please contact Donald Case at 859-912-2784.

One of my managers, Rebecca Arthur, attended the last meeting you held on the water metering issue. However, there are still some questions that I would like answers to. If you would please see the attached form and notice that I have left a blank space in which you may write your answers. When you have completed the questions, please mail it back to my attention at 406 North Street, Radcliff, KY 40160.

In addition, I would like to request that all Water Commissioners be present at the next meeting held on this subject.

Sincerely

Donald Case

c Thad Vann, Executive Director
Kentucky Manufactured Housing Institute

Attachment List of Questions

ra

Questions

1. On the numbers that you gave out at the meeting, how did you arrive at the number of accounts? Ours is not accurate. *WE HAVE BILLING RECORDS OF MHP RENTERS THAT HAVE OPENED WATER ACCOUNT. IT IS NOT UNCOMMON FOR RENTER TO MOVE IN, BUT NOT OPEN WATER ACCOUNT WITH US.*
2. Are all neighborhoods master metered so that you can tell what the water loss is?
IF YOU MEAN MOBILE HOME PARKS, YES. NO OTHER NEIGHBORHOODS HAVE MASTER METERS.
3. If you are not tracking neighborhoods with a master meter, how do you know what the water loss is?
NOT SURE WHAT YOU MEAN
4. When a water main breaks on the street, who is responsible for that water? We had a main break outside of the park on 31W that leaked for five months. *IF IT IS IN PUBLIC ROAD, AND PUBLIC WATER MAIN, WE ARE RESPONSIBLE. THAT LEAK HAS BEEN REPAIRED.*
5. When a fire hydrant is open to be flushed and runs for two hours, who is responsible for that water?
IF USED BY DISTRICT OR FIRE DEPARTMENT, WOULD BE VALID USE OF WATER. NOT SURE WHO ELSE YOU WOULD BE REFERRING TO.
6. How many cases do you show in your files for theft of water?
ABOUT 10. WE HAVE NOT PROSECUTED LATELY DUE TO CUMBERSOME COURT PROCESS. WE HAVE MANY MORE WHERE WE ONLY CHARGE TAMPERING FEE
7. We had a tenant in Yarwood that we kept reporting for theft of water, was he prosecuted? If no, why not?
CANNOT DISCUSS SPECIFIC CUSTOMER BILLING OR PROSECUTION FACTS - DUE TO PRIVACY LAW RESTRICTIONS
8. What kind of I.D. do you require for people turning on an account?
DRIVER'S LICENSE OR SS CARD
9. Do you require a copy of a signed lease?
NOT CURRENTLY
10. Do you require a copy of the deed for home owners?
NOT CURRENTLY

11. How many times have you reported to park owners when someone is jumping out a meter so that we can help you monitor them?

SENT A COUPLE WARNING LETTERS TO PARK OWNERS IN LAST SEVERAL YEARS

12. Why are meters not pulled and a lock put on when a tenant or a property owner moves out of a home?

LOCKS ARE EXPENSIVE AND OFTEN BROKEN. TRY TO KEEP COSTS DOWN AS WE DO ABOUT 300 OFF/OV'S PER MONTH & PULLING METER SLOWS DOWN PROCESS SIGNIFICANTLY

13. Under your plan, will we be held responsible for sewer charges on the water that is unbilled?

THAT WOULD BE UP TO CITY OF RADCLIFF. THEY OWN SEWER SYSTEM & SET BILLING POLICIES

14. We will be held to the Health Departments standards for this water since we will now be a distributor?

NOT SURE. WOULD BE UP TO DIVISION OF WATER.

↑ DON'T THINK THEY DO IF UNDER CERTAIN NUMBER OF RENTERS

15. Will we be required to test the water quality?

RENTERS

→ SAME ANSWER

HARDIN COUNTY WATER DISTRICT No. 1
Staff Information Item

DATE: June 19, 2006 - 2:00 PM

SUBJECT: 1st Trailer Park Meeting June 19, 2006 (Informal staff, park owner meeting)

ITEM: Minutes

ATTENDEES: Jim Bruce, Brett Pyles (HCWD1 staff)

Park Owners; J.J. Duvall, Jay Duvall (Duvall MHP), Robert Lynch (Lynch MHP), R. DeRuiter, M. DeRuiter (Paradise MHP), Rebecca Arthur (Homestead & Yarwood MHP), Phil Comeilson (Golden Rainbow MHP).

- Meeting started out with Jim Bruce explaining the problems experienced by the District.
- The Power Point Presentation was started at this point (waterloss0506)
- J.J. Duvall stated that he knew about this and stated that this is a done deal. He said he had seen some the information and he thought this was individual TP owners problem and that not all of the TP's were part of the problem. Jim responded that Board had not made a decision, but did want a proposal from staff after getting input from affected parties.
- Jim explained that the PSC would not allow us to treat owners differently and went on to explain that in addition, according to the PSC all meters were to be in the RoW or utility easement.
- J.J. Duvall asked if owners could bill the tenants for the water used. Jim said yes, but that Attorney General at PSC meeting said our tariff had to protect renters from adding profit to utility bills from owner to renters.
- Jay Duvall stated that if the tenants did not have to pay for water that they would use it endlessly. Jim said yes and explained that they could also recover expenses for keeping up the meters, reading the meters and expenses associated with billing, but our plan was to limit that fee to same District charged for "meter charge" or \$4.70 / month per account.
- Mr. DeRuiter (father) stated that this was forced on them by Marvin Logsdon in the late 80's. (Changing from master meters to lot meters). Others said HCWD1 inspected the meter installations personally. Jim noted that this showed this was a different treatment than all other meters, as only HCWD1 installs those, and customer pays for installation expense. In MHP case, park owners only paid HCWD1 for materials, and then installed by themselves, at their expense.
- Jay Duvall asked if the old "contract" was still good, because the park owners paid for the meters and stated "I put my own meters in". Others agreed.
- Jim stated that this change was actually forced on the renters, they had no choice and PSC approval was not sought nor granted. He said that staff had met with PSC and PSC staff asked if any tariff change was sought to install lot meters. Staff told them no, to their knowledge HCWD1 did not get PSC approval to move from master meters to lot meters. Most there said it happened in late, 1980's
- J.J. Duvall asked what the overall objective of this was. Jim explained that as the PPP showed, the problems were leaked water, raw sewage leaks, potential dog attacks, meters were supposed to be in RoW or utility easement and difficult access to meter pits, and theft of service, and large bills at a trailer not paid by vacating renter, because trailer owned by park and renter not responsible for plumbing leaks.

June 19, 2006
Informal HCWD1 Staff meeting with Invited MHP Owners

- There was discussion about what other utilities did about past bills left from past renters. Someone said LG&E makes park owner or new renter pay past bill from previous renter. Jim said he doubted if PSC would let District charge a different person for someone else's bill. Talked about problem of people owing for turned off account, and then just having friend or relative open new account at same address. Several said should get proof they live at address before opening account, such as deed or lease. Mr. Corneilson said he does not require leases signed by his renters.
- As pictures of raw sewer leaking on top of ground, J.J. Duvall stated that if you find that in his park he would give it to us (the park). "This does not happen in our park. Isn't there something you (the District) can do about the sewage?" Jim told him that we have reported them to the Health Dist. but ultimately nothing was done. J. J. Said sewer leaks are really a City problem, or private park owner problem and why was District trying to solve that problem. Jim responded that DoW regulations require public water system to avoid cross contamination possibilities, and that if sewage water got in potable water system, the District most likely would be held liable and fined or sued.
- J. J. Also said that apartments are not being treated same, and how much water was being lost in apartment complexes. Jim said this was not known, since there were never master meters installed for apartment buildings. Jim also pointed out differences that apartment renters cannot put their own decks and dog fences around meters, and problem of leaking septic systems or sewer pipes under trailers is not problem with apartments.
- J.J. Duval asked if there were back flow preventers in all meters. Jim stated that they were not in all of them.
- Jim commented about the fact that a lot of the meters were in hard to reach places.
- Mr. DeRuitter again stated that the District had inspected the installation of all meters. Jim noted that the locations of trailers over years had moved, and meters ended up under trailers, or within dog fences. Several agreed with this as wider trailers were installed.
- J. J. Duvall stated again that individual park owners should be responsible for their own parks and that all park owners should not be penalized.
- Jim stated that tenants would leave unpaid bills and move or would steal meters from other lots and steal water. Jay Duvall stated that tenants did not want to pay more lot rent. Brett explained the it should be a wash, because they would not have to pay the District anymore but would only pay the park owners.
- Mr. Corneilus asked if the park owners could be billed the leaked water? Several said they thought that when lot meters were installed, park owners would automatically pay for leaked water within park. Jim said to his knowledge, park owners have never paid for "leaked water and sewer", and actually, none of the park owners have a current account with the District.
- Others stated that they did not want to have to read the meters each month and that they had paid for meters just for reason of not having to read meters. Jim said that if this change is made, that all lot meters would be turned over to park owners, and they could still use them for their own billing to renters. Jim also stated there are companies that specialize in "sub-meter billing" and is common in other parts of country.
- Brett explained a scenario where if the park owner did not pay their bill for leaked water, that the whole park would be disconnected for non-payment. This could create a problem as the individual renters may have been current for their water use at their lot, but still had their water turned off because the park owner did not pay for water billed at the master meter. Staff speculated that the PSC may not allow that (having a downstream customer turned off, for non payment of an upstream master meter bill not being paid).
- Mr. Corneilus asked if the District could place a lien on the property for amount owed. He thought there should be other options for District to get paid for large master meter bills paid besides turning off water.

- J.J. Duvall asked how they would bill the tenants. Jim explained could be by park owner reading meters and splitting up their bill to renters, or just taking total W&S bill and dividing equally amount renters as added "lot rent". Several said renters don't like when costs are passed on to them, and want to see proof of why lot rent went up.
- Mr. Corneilius stated that we only had 53 accounts listed on our spreadsheet and he had not had less than 65 tenants for some time. Jim stated that this was part of the problem, renters moving in and not coming in and opening W&S account. Several others said District list of renters paying W&S did not match how many renters they had. Jim said he would not be surprised if every park had renters getting free water, since District has not way of monitoring who is moving in and out, and some renters steal meters from other empty lots.
- Mr. Corneilius asked if the District could provide them with the lots that had an account. Jim stated that we could do that and would mail these numbers to each person at meeting.
- Mr. Corneilius asked what the next step was and asked if there was going to be other meetings. Jim said he would like to invite same group back in two weeks and see if they could come up with another solution. He also said this would be followed by a general public meeting, where all park owners were invited. Several asked about Board role in changing policy. Jim explained the process, and said ultimately, the PSC would have to approve any tariff change, even though the Board had approved it.
- We thanked them for taking the time to meet with us. Jim said we would be calling about setting up second meeting. Meeting was adjourned at approximately 3:30 pm.

Jim Bruce

From: Jim Bruce
Sent: Friday, May 26, 2006 1:46 PM
To: 'Bill Rissel (E-mail)'; 'Jim Bruce (E-mail 2)'; 'John Tindall (E-mail)'; 'Les (Leslie) Powers (sgmprs@aol.com)'; 'Ron Hockman (E-mail)'; 'SBW David T. Wilson (E-mail)'; 'William Gossett (E-mail)'
Subject: TP Meeting

Tracking: Recipient	Delivery
'Bill Rissel (E-mail)'	
'Jim Bruce (E-mail 2)'	
'John Tindall (E-mail)'	
'Les (Leslie) Powers (sgmprs@aol.com)'	
'Ron Hockman (E-mail)'	
'SBW David T. Wilson (E-mail)'	
'William Gossett (E-mail)'	
Brett Pyles	Delivered: 5/26/2006 1:46 PM
Charlene Easter	Delivered: 5/26/2006 1:46 PM

Board;

We had our meeting today with Mayor of Radcliff, 3 Dept heads and a rep from county health district. We reviewed the leak numbers, unbilled water and sewer value, cost to treat and deliver leaked water, other problems with reading, document sewer leaks and contaminated water in meter pits as well as other reading problems (dogs, inside fences, under trailers). Those in attendance were in agreement something must be done, and the City indicated they would support the District on moving back to master meters. We also heard from the Fire Chief about how they handle electrical or faulty wiring problems inside trailers. If they find non-compliant wiring, they call electric utility, who pulls meter, and then Fire Dept. reports to state electrical inspector, who usually issues a notice to park that wiring must be brought up to code before trailer can be occupied again.

Julia with City also said she has issued a warnings under city sewer ordinance that a leaking sewer clean-out must be fixed within 24 hours, or water would be turned off. She said she has never had to follow through on that, and has not happened often. Rick said they have also uncovered gas meters that had been buried for years, and when the trailer was moved, the gas line was ripped out of ground. The gas company had no knowledge of the meter being there and was not billing the previous renter for gas use.

The health district rep admitted they have very little options to force sewer leak repairs, and will issue a type of citation, but often the park owner just cleans up what is visible on ground and really does no or little piping repairs. We also talked about last time we turned off Cedar Lane MHP and health dist "ordered" us to turn water back on. We were later told by PSC we should not have turned back on water and health dist does not have that authority. The lady from health dist said that happened when they were between district managers, and those that wrote the letter really did not have the authority, and are no longer at this district. She said if that happened again, they health dist would not order water district to turn water back on, even if renters did not have water (because park owner did not pay bill).

Two main suggestions came out of this meeting. These are;

1. Hold 1 or 2 meetings with just a few local park owners (Duvall, Masden, Dereuiter, etc) to review the problems and HCWD1 staff's draft tariff change, and get their input or ideas first before proceeding with a larger public meeting for larger audience. Give them a few weeks to respond, and maybe meet with them again.
2. Before proceeding with a larger public meeting, or before filing any change with PSC, go directly to press and

5/26/2006

media and present the issues to them and the planned solution (from HCWD1 perspective of using master meters). Let them ask questions and do their own investigation. The Mayor said she would be glad to attend these meetings. I specifically asked Mayor if that meeting prompted a front page story about TP problems in general in Radcliff, if she would still be for that. She said yes, it would show the City is willing to deal with these problems, and want to see park owners clean them up, and invest in repairing infrastructure which has not been done.

Both of these actions I assume would be before any Board decision or action, but maybe they should be after the Board has made a decision. Please let me know what you think about;


1. Proceeding with meeting with just staff and select park owners
2. Proceeding with meeting with media and papers about problem and possible solutions
3. OR, having staff proceed with park owners (1 or more meetings), and then bringing back to Board final staff recommendation (original plan) and then later maybe proceeding with more extensive PR campaign before any PSC filing or tariff changes filed.

If there is no concensus or clear direction from Board on how to proceed, we will hold off doing anything until June Board meeting

Also, we proposed June 13 to HCWD2 Board for Joint Board meeting. They said that is a bad night as their Board meeting will be quite long. They said later in June or July would be better. From the 21-June until 28-June on vacation. If you have other dates in June, please let me know and I will distribute to our Board and HCWD2 and Judge and see if any other those work.

Thanks!

Jim

	Quality Water Service Since 1952
Jim Bruce General Manager	Hardin County Water District No. 1 1400 Rogersville Road Radcliff, KY 40160 tel: 270-351-3222 tel2: 270-268-4069 fax: 270-352-3055 mobile: 270-268-4069
jbruce@hcwd.com	

Add me to your address book

Want a signature like this?

May 17, 2005

Hardin County Water District
Board of Commissioners

Jim Bruce
Charlene Easter
Brett Pyles

Re: Mobile Home Park/Master Metering

Jim tells me to be prepared to discuss this topic tonight. Accordingly, I thought it might be beneficial to share with you a little background information in advance.

Jim, Brett, Charlene and myself met with a host of Public Service Commission ("PSC") "Staff" members on Wednesday, May 11th at the PSC offices in Frankfort. Also present was David Spinard, an Assistant Attorney General.

It was explained both verbally and through a power point presentation that the running of individual water lines with individual meters to each individual mobile home within a privately owned mobile home park was bad business for a variety of reasons. Some of the reasons that were touched upon at the presentation include the unsanitary and dangerous conditions to which District employees were exposed; the disproportionate amount of water loss attributable to the lines located within the mobile home parks; the fact that the other District customers effectively subsidized the water usage in the mobile home parks and that the mobile home parks were in general owned by out of state landlords; the fact that existing PSC regs and Board policy mandate that meters be placed in state right of way as opposed to being located within private property.

The issue to be resolved is how does the District quit serving 1,500 customers who live in mobile home parks and instead bill approximately 25 mobile home park owners for the water usage.

Some of the observations made by PSC Staff which I found to be particularly revealing are as follows:

1. Staff feels the best way to protect the District is to file an "action" with the PSC. An "action" is the equivalent of a lawsuit except it is filed with the PSC as opposed to being filed in a circuit court. The Staff feels that this allows us to more effectively give notice to mobile home park owners, the tenants, and the Health Department regarding the problems associated with the current arrangements;
2. Staff points out that the District has acquiesced in the installation of the individual meters and quarter inch line which runs throughout the mobile home parks.

Moreover, the District has read the individual meters for probably 25 or 30 years. Accordingly, Staff feels that there is a legal issue as to whether or not we can abandon this role once we have assumed it;

3. Staff thinks it would probably be beneficial to give notice to the Health Department so that they can set forth their position regarding the health/safety issue often found within the mobile home parks, i.e. raw sewage on the ground and in meter pits. Personally, I think this is a very good idea because it forces the Health Department to be on record with their position.

4. Staff suggest that we build in some protection for tenants relative to pricing. More specifically, there is a reg which prohibits the resale of water. Staff thinks that this prohibition should be included in the new tariff so that the District has at least an implicit ability to regulate the price, which the mobile home park owner passes on to the mobile home park resident;

5. Staff recommends that we immediately get our master meters in place so that we can begin to monitor and ultimately verify the amount of water loss attributable to each mobile home park. Furthermore, Staff recommends that we begin to advise the mobile home park owners of this water loss as soon as possible;

6. Staff raises the issue of mobile home parks versus apartment buildings. Apartment buildings are likewise in violation of the PSC regulation and Board policy which says meters have to be on public right of ways. However, we are not objecting to the apartments since they do not create a health hazard nor do they result in a massive water loss. Staff thinks that we need to be prepared to distinguish between apartments and mobile home parks;

7. Staff also discussed two different approaches to addressing the problem. One approach would be that when a customer living in a mobile home park moves out, the District then would refuse to provide a hook-up to the new mobile home tenant. The benefit of this approach is that it pretty well eliminates the argument that we have always served these tenants and therefore we must continue to do so. The problem with this approach is that it would take years to totally rectify the problem. The alternative approach is to receive a hearing before the PSC requesting an approval of a tariff that would allow the District to pick a date in the future (say six months) at which point the District would no longer read individual meters found within mobile home parks. Obviously, this later approach solves the problem much quicker, but the negative publicity would be greater;

8. Staff agreed that in the instance of hazardous conditions, that our new tariff should have a clause that allows for immediate termination.

Assuming the Board wants to go forward with addressing the problem of serving each tenant within a mobile home park, the issue to be decided is whether or not the Board wants to take the one mobile home park approach or the blanket approach.

I will attempt to answer any questions you have tonight.

SKEETERS, BENNETT & WILSON PLC

David T. Wilson II

Jim Bruce

From: Jim Bruce
Sent: Thursday, September 29, 2005 12:41 PM
To: 'tvann@kmhi.org'
Subject: Billing Proposal

Mr. Vann;

I received your inquiry about a proposed change to billing trailer parks for water & sewer in Radcliff. I would certainly like to talk to you over the phone, but would also like to invite you to Radcliff to discuss our proposal firsthand. We have been working on a solution for this problem for several years, and our Board has yet to take any action or made a decision. We have met with PSC staff, and will probably meet again before we decide whether to proceed. At this time, no decision or filing has been made to the PSC, and it may not be until early to late 2006.

Please call me at your convenience.

Thank You

Hardin County Water District No 1	Providing Quality Water for over 50 Years
Jim Bruce General Manager	Hardin County Water District No. 1 1400 Rogersville Road Radcliff, KY 40160
jbruce@hcwd.com www hcwd.com	tel: 270-351-3222 fax: 270-352-3055 mobile: 270-352-8750

Add me to your address book.

Want a signature like this?

**HOMESTEAD M.H.C./YARWOOD M.H.P.
406 NORTH STREET
RADCLIFF, KY 40160
PHONE (270) 351-1376
FAX (270) 351-3292**

September 29 2005

Jim Bruce, Manager
Hardin County Water District #1
1400 Rogersville Road
Radcliff, KY 40160

Dear Mr. Bruce:

**PROPOSED CHANGES IN WATER METER READING FOR MOBILE HOME
COMMUNITIES**

In regards to our telephone conversation on September 21, 2005 at 3:30 p.m., I mentioned to you about the proposed changes to read one master meter for mobile home communities instead of individual meters and you seem shocked that I found out about these changes. My feelings are that this is being done secretly and at private discussions, which could possibly violate state open records laws.

We expect that all discussions pertaining to this matter be held at public meetings. Therefore, I would respectfully request to be notified of any meetings or discussions regarding this matter. In addition, I would like to be considered for appointment to any committee formed to study this matter. You may contact me at my office number (270) 351-1376, my cell number (859) 250-9436, or my office address 406 North Street, Radcliff, KY 40160.

Sincerely



Ron Peake
Property Manager

c Sheila Enyart, Mayor City of Radcliff
Thad Vann, Executive Director
Kentucky Manufactured Housing Institute

ra

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

October 4, 2005

Mr. Ron Peake
Property Manager - Homestead MHC / Yarwood MHP
406 North Street
Radcliff, KY. 40160

SUBJECT: Response to September 29, 2005 Letter

Dear Mr. Peake;

I did receive your letter of 29-September and your requests. I can assure you that all the meetings in the past where this issue has been discussed, and all in the future, have and will fully comply with Kentucky open meetings laws. All discussions about this topic have been listed on our Board agenda in the past, and have been discussed in open session, *which is open to the public. There have been no secret sessions or unannounced meetings of our Board regarding this topic.*

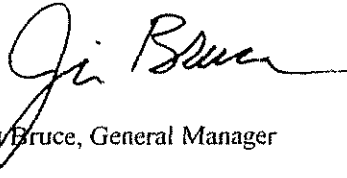
Our regular Board meetings are held the third Tuesday of each month at 5:30 p.m. and you are certainly welcome to attend and address the Board. Should our Board decide to proceed with a tariff change and file that with the Public Service Commission (PSC), that filing would need to be published in the newspaper. If the PSC decides to hold a public hearing, that would also be open to the public and notice placed in the local paper.

Regarding a special invitation to a future Board meeting, I do not believe this would be necessary or required since our regular meetings have a set date, and the media has been advised of this meeting date, and we post the agenda on the front door of our building the day of the meeting. You may also call at any time to find the content of the agenda, once it is finalized.

During our phone conversation, I mentioned that our Board may choose to hold a special public information meeting regarding this subject, before a filing with the PSC. I will let you know of that meeting time and date ahead of time. We would like to hear your concerns, as well as any other of our other 9,300 customers concerns regarding this change.

If you have any other questions, I would be glad to talk with you about them. Again, I will make sure you are also notified of any voluntary future public information meeting that our Board may schedule.

Sincerely,



Jim Bruce, General Manager

Cf; Mr. William Rissel, Chairman, HCWD1
Mr. David Wilson II, HCWD1 Attorney



Lincoln Trail District Health Department

P.O. BOX 2609, 1222 WOODLAND DRIVE
ELIZABETHTOWN, KENTUCKY 42702-2609
(270) 769-1601
FAX (270) 765-7274

Hardin County Water District #1
1400 Rogersville Road
Radcliff, KY 40160

October 8, 2004

Mr. Brett Pyles:

This letter is concerning the matter which we were discussing today in your office involving the ten families at the Cedar Lane Mobile Home Park, 1401 Vine Street, Radcliff, KY, who are without water service at this time after having their water shut off this morning. Due to the dispute of current ownership of the mobile home park and the late hour of the day, the Lincoln Trail District Health Department is hereby ordering that water service be turned back on immediately to provide an adequate water supply to these people who unwittingly had their water service disconnected until this matter can be resolved.

Sincerely,

Angie Mattingly, R.S.
Hardin County Environmental Services
by authorization from:
Rick Molohon, Environmental Director
Linda Sims, Director

□ GRAYSON CO. HEALTH CENTER
124 EAST WHITE OAK ST.
MCHFIELD, KENTUCKY 42754
(270) 259-3141

□ HARDIN CO. HEALTH CENTER/E-TOWN
580 WESTPORT ROAD
ELIZABETHTOWN, KENTUCKY 42701
(270) 765-6196

□ HARDIN CO. HEALTH CENTER/RADCLIFF
1483 NORTH WILSON
RADCLIFF, KENTUCKY 40160
(270) 352-2526

□ LARUE CO. HEALTH CENTER
215 EAST MAIN ST.
HODGENVILLE, KENTUCKY 42748
(270) 358-3844

□ MAHON CO. HEALTH CENTER
516 NORTH SPALDING AVE.
LEBANON, KENTUCKY 40033
(270) 892-5393

□ MEADE CO. HEALTH CENTER
620 FAIRWAY DRIVE
BRANDENBURG, KENTUCKY 40108
(270) 422-3988

□ NELSON CO. HEALTH CENTER
325 SOUTH THIRD
BARDSTOWN, KENTUCKY 40004
(502) 348-3222

□ WASHINGTON CO. HEALTH CENTER
302 EAST MAIN ST.
SPRINGFIELD, KENTUCKY 40069
(860) 336-3300

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY 40160

August 27, 2004

PHP Business Group Inc.
Mr. Elijah Isaiah X
P.O. Box 684
Owings Mills, MD 21117

Subject: 1401 W. Vine Street

Dear Mr. Elijah Isaiah X;

Please be advised as of August 26, 2004 all the meters located at 1401 W. Vine Street were read and water and sewer accounts have been closed for the customers residing in the Park. Final bills or refunds have been prepared and will be mailed.

Enclosed you will find a list of all meters located in the Park to include readings and Serial Numbers. The District transfers all these individual lot water meters, water lines and associated appurtenances located within the Park to PHP Business Group Inc. The District will no longer be responsible for any equipment or appurtenances located on this private property. You will receive a bill for water and wastewater charges each month based on the quantity of water measured by the master meter. Your bill will be mailed around the 12th of each month and due on the 27th.

If we can be of any assistance to you in the future please feel free to contact us.

Sincerely,

Charlene Easter
Customer Service Manager

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY 40160

August 26, 2004

BARD, KIMBERLY R
1401 W. VINE ST. #33
Radcliff, KY 40160

SUBJECT: Final Bill ACCOUNT # 79620513 - 1401 W. VINE ST. #33

Dear BARD, KIMBERLY R

Your water and sewer account has been closed and a final bill prepared. A (REFUND OR BILL) is attached. As you are aware, this mobile home park has been purchased by PHP BUSINESS GROUP INC. The new owner has requested that water and sewer billing be billed directly to them. You will no longer need to pay the water and sewer bill to the District.

This change of billing point is consistent with our current filed tariff (Sheet 7, A, October 2000) concerning locating water meters nearest the water main and public right of way. The District no longer allows water meters to be located on private property as several mobile parks have had in past. This method of billing for mobile home parks is also consistent with Public Service Commission regulations (807 KAR 5.066, Section 12) regarding point of service and location of water meters.

After this change, all individual lot water meters, water lines and associated appurtenances located within the Park shall become the sole responsibility of PHP Business Group Inc. Effective immediately the District will no longer be responsible for any equipment or appurtenances that is located on this private property. PHP Business Group Inc. will be responsible for paying for all future water and wastewater charges incurred, based on the quantity of water measured by a master meter.

Please contact the PHP Business Group Inc. for instructions on how to pay for any water usages after this date.

If we can be of assist to you in the future please feel free to contact us.

Sincerely,

Charlene Easter
Customer Service Manager

SKEETERS, BENNETT AND WILSON, PLC

ATTORNEYS AT LAW
550 W. LINCOLN TRAIL BLVD.
P O BOX 610
RADCLIFF, KENTUCKY 40160

NALD E. SKEETERS
TERRY BENNETT
DAVID T. WILSON II
LORI A. LODGE
MICHAEL A. PIKE
JEREMY S. ALDRIDGE

TEL: (270) 351-4404

FAX: (270) 352-4626

REAL ESTATE DEPT:

TEL: (270) 352-4406

FAX: (270) 352-4421

February 18, 2003

Jim Bruce
Hardin County Water District
P.O. Box 489
Radcliff, Ky 40160

Dear Jim:

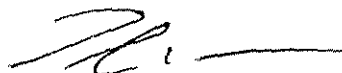
This letter is in response to our conversation last month regarding the District's ability to move water meters off of mobile home lots. It is my understanding the District would much prefer to have one master meter running into a mobile home part as opposed to one meter for each mobile home.

I would suggest that there are two possible pitfalls which the District may encounter in moving the meters. The first is that the PSC may attempt to prohibit the practice. I would suggest that the best way to address this concern is to discuss it with the PSC in advance. You indicate that our tariff has been modified as it effects *new meters* and specifies they must be on public right of way as opposed to private property. I think the question becomes does the existing tariff allow us to compel the movement of meters off of private mobile home lots. The second question is whether or not the PSC would prohibit such an endeavor.

There is also the prospect of a civil suit if the District were to attempt to move the meters. Generally speaking, I believe the District will be insulated by the decision of the PSC. Accordingly, in the final analysis, I think the best way to address the problem is with correspondence and/or a meeting with the PSC.

Please let me know if you wish to go forward along those lines.

Sincerely,
SKEETERS, BENNETT & WILSON PLC



David T. Wilson II

DTW:dnf

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

January 15, 2003

Ms. Angie Mattingly, R.S.
Senior Environmentalist
Lincoln Trail Health District
580C Westport Road
Elizabethtown, KY. 42701
(FAX'd To: 769-0471 - Original Mailed)

SUBJECT: Potential Sewage Contamination

Dear Ms. Mattingly;

For some time, we have been concerned whenever we find leaking raw sewage near or in water meter vaults. Often the sewage contaminated water fills the meter pit and our employees have to bail out the water to read the meter. As this water engulfs potable water device and plumbing, there is a real risk for a cross connection and a health risk to persons using this water.

We have recently seen an increase of leaking sewage both on the ground and in meter vaults, all in mobile home parks (MHP's). Often these are evidenced by toilet paper on the ground, a broken or clearly leaking sewer clean out, food by-product wastes or apparent human feces on the ground. Often there are children's outdoor toys in the yards near the leaking sewage. The smell also is quite strong.

We have contacted the City of Radcliff about addresses within the City limits. They do not have any ordinances which can force an immediate repair of these problems. We recently took samples of the water in the meter pits at 17 different lots to have them analyzed for the presence of coliform bacteria. All 17 results came back with positive readings. The addresses and lots which we had samples tested are;

1304 Elm #18-B
1304 Elm #18

Parkside Mobile Home Park - #353
Parkside Mobile Home Park - #303
Parkside Mobile Home Park - #297
Parkside Mobile Home Park - #357

1401 Vine - #31
1401 Vine - #59
1401 Vine - #81
1401 Vine - #82

Dixie Mobile Home Park - #115
Dixie Mobile Home Park - #122
Dixie Mobile Home Park - #318
Dixie Mobile Home Park - #428

Smith Street - #376
Smith Street - #3
Smith Street - #12

Ms. Angie Mattingly, R.S, Senior Environmentalist
Potential Sewage Contamination

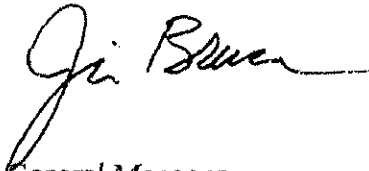
January 15, 2003

(We have attached the sample test results from our laboratory. We also have enclosed some of the photographs for these lots and also have some video showing evidence of sewage on the ground if you would like to see this.)

As our District has a liability and responsibility to make sure contaminated water does not contact or mix with drinking water, we believe we need to act on this problem immediately. We would request that your office make an inspection of these properties and take any enforcement action available to have the property owners repair these leaks and clean up the surrounding area and sewage pools.

If you cannot assist, please let us know if there are other state or federal agencies which may have jurisdiction over this problem. We would be glad to meet with you any time to review this problem, or to meet on site. There are other properties we could also forward to you, but there were those that we found and documented as of December 19. Please call if you have any questions.

Sincerely,



Jim Bruce, General Manager

Encl. Test results, Beckmar Laboratories
Photos of 10 of the addresses

Cf; Mayor Sheila Enyart, City of Radcliff



Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

October 18, 2002

Mr. Wallace Goodman
376 Smith Street (CERTIFIED MAIL)
Radcliff, KY. 40160

SUBJECT: Meter Connection & Point of Service - 613 Millcreek

Dear Mr. Goodman;

We have talked with the Public Service Commission (PSC) regarding the application of our tariff and Meter Connection points since our conversation this week. As I explained, our District has changed our Meter Connect rules in our filed and approved tariff. Since April 2000, we no longer allow individual meters to be installed on private water mains within private property such as a trailer park. As we are a regulated utility in Kentucky, we are required to comply with (PSC) regulations and follow the rules filed in our tariff.

The PSC sees the location of the water meter as the "point of service". All the pipes before or upstream of the meter become the responsibility of the utility. There are several trailer parks in Radcliff which years ago were converted from a master meter (single bill to park owner) to individual lot meters for renters. This required the District to then become responsible for the private water lines in the park, which most lines are of substandard construction and are now leaking. This was the primary reason for changing to only master meter billing.

Another PSC regulation (807 KAR 5:066, Section 12 .1.b) states; "...*the customer's point of service shall be located at that point on or near the street right-of-way or property line most accessible to the utility from its distribution system...*". Because there is an existing public water main on the road in front of your property, and a master meter has already been installed for billing for this park (Account #2070180902 - D.J. Rentals), we believe that the property meter location and point of service is the master meter.

For the above reasons, we will not be providing individual meters for separate billing and individual customer accounts in this park, or any other new or future trailer park being

Mr Wallace Goodman

SUBJECT: Meter Connection & Point of Service - 613 Millcreek

Page 2

built or planned in our service area. You have three options for metering this property which are;

1. Master Meter: This would be a single meter which we would read and mail you or the responsible party a single bill monthly for all water & sewer charges on the property. You could split up the line on your property to as many trailers as are there, but we would only have one account holder for the Master Meter.
2. Master Meter with Private Meters: We would bill for only the master meter. You could also install individual private meters as a tool to divide your total water and sewer charges among your renters based on their individual water use. To assist you in splitting up the bill, we could provide you a table or spreadsheet to calculate the individual bills based on water use. Your billing and collection from your tenants would be private and we would not have an account for each nor would be responsible for the billing and collection using your private meters. The individual meters within your property would remain your property and you would maintain, test and replace as needed in the future.
3. Individual Account Meters at Water Main: You could pay the regular Meter Connect Fee for each meter which we would install at the water main in the street. You would be responsible to run a service line from each meter to each trailer. We would establish an individual account for each trailer and renter in the future and bill them directly. The District would own, maintain and test the meters. The installation charge for each 5/8 inch meter is \$650.

As you have already purchased some of the individual meters and parts, we would allow you to return these for credit if you decide to only use a Master Meter. If you want to have us install the meters at the road, we would also provide you credit for each meter and materials that are still in useable condition which we would then use to install at road. If you want to return these for credit, you would need to do so before **NOVEMBER 15, 2002** and we will be glad to send you a refund check for the full amount paid.

Because our current tariff and policies were put into place following full public disclosure and public advertisement, we do not believe we were negligent in selling you the


Mr. Wallace Goodman
SUBJECT: Meter Connection & Point of Service - 613 Millcreek

Page 3

materials already for use in your park. We also are required to have a copy of all our billing policies for public review in our lobby, which we do. As I mentioned when we met, we still do sell meters to parks for replacement, for private metering or at parks where individual meters have already been installed and we would not have known when you purchased the materials what your intended purpose was. Still, we are willing to take back those materials if you decide not to use them by the date indicated above.

We have enclosed a copy of our approved tariff sheet which covers meter connections. I apologize for any confusion this has caused. If you believe we have not followed our tariff or have not been treated fairly, you may contact the Kentucky Public Service Commission at 1-800-772-4636. Please feel free to call me if you have any questions.

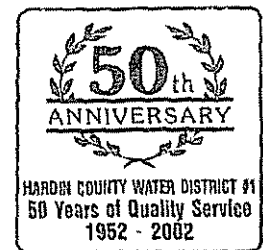
Sincerely,



Jim Bruce, General Manager

Enc.

Cf: Ms. Ginny Smith, PSC Consumer Investigations
Mr. David Wilson II, HCWD#1 Attorney
Ms. Karen Brown, Customer Service Team Leader
Ms. Linda Thompson, Billing Specialist
Mr. Steve Barno, City of Radcliff, Planning & Development



Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 45 Years

1400 Rogersville Road
Radcliff, KY. 40160

March 27, 2001

Property Owner / Manager
Cedar Lane Mobile Home Park
1401 W Vine, Lot #96
Radcliff, KY. 40160

SUBJECT: Theft of Utility Services

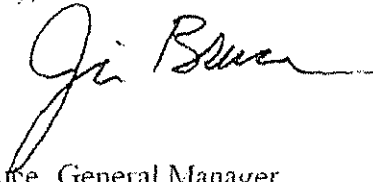
To Whom it May Concern;

We have had an excessive number of tenants in your park turning their water back on after it has been turned off for non-payment of water and sewer charges. We have started putting warning tags on meters when turned off for non-payment. Under Kentucky statues (KRS 514.060), it is illegal to tamper with or turn on a utility meter after service has been turned off for non-payment. Depending on the value of services taken, the offense may be a misdemeanor or felony.

Please notify all of your tenants that theft of services will result in added Meter Tampering Charges and possible prosecution for Theft of Services through the Hardin County Attorney's office. We have already had to ask the Radcliff Police Department to assist us in citing offenders for these actions.

If chronic and repeated theft of services continues at certain Mobile Home Parks, we may also consider removing all tenant meters and begin billing park owners through a single Master Meter, which is allowed under Kentucky Public Service Commission regulations. We would appreciate your making this clear to all your renters so we both can avoid additional legal actions or added costs to your renters.

Sincerely,



Jim Bruce, General Manager

c: Ms Karen Brown, Customer Service Team Leader
Chief Bloodworth, Radcliff Police Department

MEMORANDUM
Hardin County Water District #1

DATE: October 19, 1998

TO: David Wilson

FROM: Jim Bruce 

SUBJECT: Service & Main Extension Policies

David;

I talked with Ron about the meter location issue for Fred Robinson. There are many other similar situations that I think we need to address. I told Ron that I would like to include service location issues, sizing and main extension location in a future update to our *Standard Construction Specifications & Policies*. Several of these changes would need to be approved by the PSC (maybe) and others may not. Please review the list and let me know if you see any KRS issues or other problems we might encounter if we propose these changes;

1. Main Extensions to Furthest Property Line: Any water main extended must extend to the furthest portion of the land owners lot or parcel at their expense (Currently, owners bring the water to the corner of their lot, forcing the next person to then extend the main the rest of the distance along the first lot, with no benefit to the subsequent owner. Many water utilities use this "furthest point" requirement, but might share the cost of part of the extra length. We currently pay 50 feet of the main extension cost for each tap)
2. Meter Location Standard. A standard drawing which shows where new meters must be located. This would be for convenience of the utility for service and meter reading (Currently, we let the landowner pick the meter location. Most of the time that works, but on multi-unit buildings, they want the meters closest to the building which requires the utility to maintain a service line under concrete or asphalt)
3. Number of Units/Meter - Minimum/Maximum Meter Size: This would require that only so many dwelling units be attached to one service line to prevent complaints about poor water pressure. Also, a requirement that a meter sized for the actual

hydraulic demand. (We sometimes get an owner who wants a larger sized meter, but their water use will be so low that the meter operates out of specifications and does not record low flows. We also cannot tell someone that a fourplex needs a 1.5 inch meter, if they want they will buy the smallest and create a pressure problem that we have to deal with later)

4. Moving Existing Meter Locations: If we determine that the meter is not in the best location for the utility, we can re-locate it at our expense. The service line from the meter to the building will become the owners responsibility (We have several locations where someone in years past, moved the meter closer to the building, either to avoid the cost of running two lines from the meter to each unit, to make it closer to the building for maintenance or to avoid the cost of maintaining a long service line. We would like to move these back to the correct location, in the public right of way or easement)
5. Eliminate Trailer Park Multi-Meters: If there is an existing Master Meter, with multiple lot meters on private property, the District would reimburse the park owner the cost of a meter set, and abandon the individual lot meters and begin using the Master Meter. All service lines within the park would become the owners responsibility to maintain and the water/sewer bill would be charged based on the Master Meter reading. (This is a large problem. Over the years, Marvin and the District Board's favored the park owner to shift the water bill the renter. In most cases, we installed individual meters within the park and no longer read the Master Meter which was the initial metering point. These individual meters now take up an inordinate amount of our time to shut off and on for non payment and move in's, while the meters remain on private property with no utility easement. Most water utilities avoid placing individual meters at each trailer and require the park owner to pay the water bill, and use their own private meters to read if they want to distribute their water bill equitably to renters.)
6. Master Plan Oversizing: Once we develop a system Master Plan, future developers would be required to install those size lines or facilities that are shown on the Master Plan. This may require oversizing a line for future extension or growth, that does not benefit the current owner. In the case that oversizing is required, the District would pay the oversized portion based on the estimated increase in materials and labor to install the larger size facilities. (This District has never used a Master Plan approach

to system design and expansion. It makes for a better, more efficiently designed and operating system if we were to incorporate a Master Plan that showed future line sizes, locations and storage facilities based on assumed growth rates and zoning. If we did employ this, we would need to tell a developer that they would need to, for example, install a 10 inch main because we will need that size in the future to move water past their development, to another area. We would pay the extra costs, but the developer would still need to pay the portion for their own development.)

7. Touch Read Meter Devices: In the future, we plan to use touch read or radio drive by reading technology. This would require a type of device inserted in the meter box lid, or in the meter pit. We would like to make the cost of this part of the connect fee as we do now with all other meter appurtenances.
8. Added Cost of Road Bore: When we install a service to a house across a road from the main, we incur much more time and expense. Instead of averaging all these extra costs, we would like to un bundle the cost of the road bore and add that to only those taps that require this. This would lower the cost for someone adjacent to the main. (This is something District #2 has done with PSC approval)

Please give me a call if you need clarification on these items.

Thanks

SKEETERS, BENNETT AND WILSON

ATTORNEYS AT LAW
550 W LINCOLN TRAIL BLVD.
P O. BOX 610
RADCLIFF, KENTUCKY 40160

JONALD E. SKEETERS
R. TERRY BENNETT
DAVID T. WILSON II
DAVID T. GRAY
LORI A. LODGE-LANE
TROY A. McPEAK

TEL: (502) 351-4404

FAX: (502) 352-4626

REAL ESTATE DEPT:

TEL: (502) 352-4406

November 30, 1998

Jim Bruce
Hardin County Water Dist. #1
1400 Rogersville Rd.
Radcliff, KY 40160

Re: Service & Main Extension Policies

Dear Jim:

The following are responses to your eight questions outlined in your memo dated October 19, 1998:

1. Main Extensions to Furthest Property Line:

It is my opinion that HCWD #1 can use the "furthest point" requirement, however, HCWD #1 should seek prior approval from the Public Service Commission. 807 KAR 5:066, Section 11 states that an extension of 50 feet or less shall be made by a utility to its existing distribution main without charge for a prospective customer who shall apply for and contract to use service for one (1) year or more. When an extension of the utility's main to serve an applicant or group of applicants amounts to more than fifty (50) feet per applicant, the utility may if not inconsistent with its filed tariff require the total cost of the excessive footage over fifty (50) feet per customer to be deposited with the utility by the applicant or the applicants, based on the average cost per foot of the total extension. Each customer who paid for service under such extension shall be reimbursed under one of the two plans.

An applicant desiring an extension to a proposed real estate subdivision may be required to pay the entire cost of the extension. Each year, for a refund period of not less than ten (10) years, the utility shall refund to the applicant who paid for the extension equal to the cost of fifty (50) feet of the extension installed for each new customer connected during the year whose service line is directly connected to the extension installed by the developer, and not to extensions or laterals therefrom.

November 30, 1998

Jim Bruce

Page 2

807 KAR 5.066, Section 11(4) states that nothing contained herein shall be construed to prohibit the utility from making extensions under different arrangements if such arrangements have received the prior approval of the commission

2. Meter Location Standard:

It is my opinion that HCWD #1 may establish standard drawings which indicate where new meters must be located; however, HCWD #1 should seek prior approval from the Public Service Commission. 807 KAR 5:066, Section 12 states in subparagraph (b) "In areas where the distribution system follows well-defined streets and roads, the customer's point of service shall be located at that point on or near the street right-of-way or property line most accessible to the utility from its distribution system. In areas where the distribution system does not follow streets and roads, the point of service shall be located as near the customer's property line as practicable. Prior to installation of the meter the utility shall consult with the customer as to the most practical location".

807 KAR 5.066, Section 13(4), each utility shall adopt a standard method of installing meters and service lines and shall file with the commission a written description and drawings in sufficient detail that the requirements are clearly understandable. Copies of these standard methods shall be made available to prospective customers and contractors or others engaged in the business of placing pipe for water utilization. All meters shall be set in place by the utility.

3. Number of Units/Meter - Minimum/Maximum Meter Size.

It is my opinion that HCWD #1 may require that only so many dwellings are to be attached to one service line to prevent complaints about poor water pressure. In addition, it is my opinion that HCWD #1 may require a meter sized for the actual hydraulic demand. However, HCWD #1 should seek prior approval from the Public Service Commission pursuant to 807 KAR 5.066, Section 13(4).

KRS 74.080 states that the commission may establish water rates and make reasonable regulations for the disposition and consumption of water.

KRS 278.030 states that every utility shall furnish adequate, efficient and reasonable service, and may establish reasonable rules governing the conduct of its and the conditions under which it shall be required to render service

In Middletown Water Dist. v. Tucker, 284 S.W. 2d 666 (Ky. App. 1955), the Court held that enforcement of regulation of water district permitting service connections only with houses facing a street or road with a water main therein against appellee was not discriminatory in view of the stipulation that all other noncomplying users, with two possible exceptions, had connected prior to the adoption of the regulation. Furthermore,

November 30, 1998

Jim Bruce

Page 3

the Court stated that the purpose of a regulation was to control the water system expansion and to provide fire protection and said purpose was not an unreasonable and unenforceable attempt to regulate its services.

Although the issue of prior Public Service Commission's approval is more ambiguous with this issue, it is my opinion that it would be much safer to pursue prior commission's approval because of 807 KAR 5.066, Section 13(4), which states that each utility shall adopt a standard method of installing meters and service lines and shall file with the commission a written description and drawings in sufficient detail that the requirements are clearly understandable

4. Moving Existing Meter Locations.

Since I have been unable to find any Kentucky Revised Statutes or Kentucky Administrative Regulations on point, it is my opinion that HCWD #1 may move existing meters at its own expense. You state in your memo that in several locations in the past, someone has moved the meter closer to a particular building. Who the person is who moved the meter may have some bearing on this issue. If it was the private individual who moved the meter away from the public right of way or easement, then I feel that it gives the HCWD #1 better standing in which to move the meter to the correct location of the public right of way or easement. On the other hand, if it were the utility that moved the meter, then perhaps the property owner would have some kind of common law estoppel or taking claim. Please keep in mind that 807 KAR 5:066, Section 12 states that in areas where the distribution system follows well defined streets and roads, the customer's point of service shall be located at that point on or near the street right of way or property line most accessible to the utility from its distribution system. In areas where the distribution system does not follow streets and roads, point of service shall be located as near the customer's property line as practicable. Prior to installation of the meter, the utility shall consult with the customer as to the most practicable location. I believe this same obligation would apply to relocation as well.

5. Eliminate Trailer Park Multi-Meters.

As in question 4, I have not been able to find any Kentucky Revised Statutes or Kentucky Administrative Regulations on point concerning the HCWD's #1 ability to eliminate trailer park multi meters. Although it seems unreasonable to eliminate trailer park multi meters in the future, I am concerned about eliminating existing trailer park multi meters due to potential common law promissory estoppel and/or taking arguments. KRS 278.030 states that every utility shall furnish adequate, efficient and reasonable service, and may establish reasonable rules governing the conduct of its business and the conditions under which it shall be required to render service. It could be argued that each trailer park individual lot meter is a current customer and it is unreasonable to now define our customer as the property owner. Unfortunately, it does not appear that KRS or KAR

November 30, 1998

Jim Bruce

Page 4

defines a utility's customer. In summary, HCWD #1 clearly can establish reasonable rules governing the future conduct of its business and the conditions under which it shall be required to render service, but must weigh the risk of civil actions in response to the HCDW's #1 elimination of currently existing trailer park multi meters and moving existing meter locations.

6. Master Plan Oversizing:

I see no legal problem with master plan oversizing as long as the water district pays the oversize portion of the expense. However, I think the HCWD #1 should seek prior approval from the Public Service Commission based on 807 KAR 5:066, Section 11(4) which states that nothing contained herein shall be construed to prohibit the utility from making extensions under different arrangements if such arrangements have received the prior approval of the commission.

7. Touch Read Meter Devices:

I see no legal issues concerning the touch read meter devices, however, HCWD #1 should seek prior approval from the Public Service Commission. KRS 278.0152 states that any utility subject to this chapter which is engaged in the distributing or furnishing of water to or for the public, for compensation, may, subject to the approval of the commission, make a charge or "tapping fee" for installing service to its customers. The tapping fee shall include charges for a service tap, meter, meter vault, and installation thereof.

8. Added Cost of Road Bore:

I do not see any legal issues with respect to passing along the added cost of road bores to effective customer, however, HCWD #1 should seek prior approval from the Public Service Commission. KRS 278.0152 states that any utility subject to this chapter which is engaged in the distributing or furnishing of water to or for the public, for compensation, may, subject to the approval of the commission, make a charge or "tapping fee" for installing service to its customers. The tapping fee shall include charges for a service tap, meter, meter vault, and installation thereof. Please keep in mind that 807 KAR 5:066, Section 12 states that the utility shall furnish and install at its own expense for the purpose of connecting its distribution system to the customer's premises that portion of the service connection from its main to and including the meter and meter box. The utility may recoup its expense from the customer in accordance with KRS 278.0152. Perhaps, HCWD #1 could consider leaving the meter on the same side of the street as is the water main.

November 30, 1998


Jim Bruce

Page 5

If you have any questions or would like to discuss these issues further, please feel free to contact me.

Sincerely,

SKEETERS, BENNETT & WILSON

A handwritten signature in cursive script, appearing to read "Troy A. McPeak".

Troy A. McPeak

TAM:jrf



COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION
730 SCHENKEL LANE
POST OFFICE BOX 615
FRANKFORT KY 40602
(502) 564-3940

March 6, 1991

1991 MAR -9 PM 4:14

Ms. Gail Park
Hardin County Water District No. 1
409 West Lincoln Trail Boulevard
Radcliff, KY 40160

Dear Gail:

Enclosed is an Order which addresses the Commission's position of the billing of multi-units through a master meter. I apologize for the delay in sending this to you, but our work load here never seems to decrease.

If you have any questions, feel free to give me a call.

Sincerely,

A handwritten signature in cursive script that reads "Carryn Lee".

Carryn Lee
Public Utility Rate Analyst

CL:lad

Enclosure



COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION
730 SCHENKEL LANE
POST OFFICE BOX 615
FRANKFORT, KY 40602
(502) 564-3940

April 1, 1991

Mr. Gale Y. Park
Office Manager
Hardin County Water District #1
409 West Lincoln Trail Blvd.
P. O. Box 489
Radcliffe, Kentucky 40160

Dear Mr. Park:

The Commission received on March 11, 1991 your letter requesting responses to several questions regarding multi-meter billing. We will address these questions in the order in which they were posed.

Multi-Units

1. What is the correct procedure for raising and lowering multi-meter status in regards to units used intermittently?

2. If the owner requests the multi-status be lowered, does the District always verify the unit is vacant and if we do, is a charge assessed for our service man who makes the trip out? (We do have under our tariff a service charge of \$7.50 and a \$15.00, unnecessary service call charge.)

In response to the above questions, I have enclosed a copy of the Commission's Order in Case No. 10132. On pages 8-11 of the Order, the Commission addressed this issue. As you can see, the Commission determined that it is the responsibility of the customer to inform the utility of the number of occupied units and of a change in occupancy status. If the utility wants to verify the number of the units that are occupied, it should do so at its own expense or when it reads the meter. Since it is the customer's responsibility to ensure that he is being properly billed, however, billings to owners of multiple unit buildings should indicate the number of units for which a customer is being billed. The utility should also inform customers billed for multiple unit buildings of their right to report changes in the number of occupied units.

3. When a multi 4 has 3 vacant lots and the owner wants the multi status changed to 1, do we code this account "residential" or do we keep it coded "multi-commercial" and charge Kentucky sales tax?

Mr. Gale Y. Park
April 1, 1991
Page 2

The decision on changing from commercial to residential has nothing to do with the number of units served, but rather the nature of the customer. A customer is either commercial or residential according to the normal meaning of those terms.

Master Meters


1. How do we bill master meters for privately-owned trailer parks that have individual meters for each lot?
2. Should the owner of the park be billed for the difference of the water consumption from the reading of the master meter, where water enters the park's private lines, and the readings from each individual meter?
3. If so, is the master meter read first or last?
4. If a leak is discovered in the privately-owned service lines within the park, but between each individual lot's meter, is the owner responsible for paying for water loss since the leak is on his service line?

In response to the above questions, it is unusual for a utility to have a master meter and individual meters at the same time and charge for service at both points. The utility should either charge the master meter (park owner) or charge each individual meter, not both. It is our opinion that the utility should bill the master meter (park owner), read the individual meters, give the park owner the data, and let him recover his expenses by pro-rating the bill to each trailer based on the meter reading provided him by the utility.

807 KAR 5:066, Section 13(1)(b), defines a customer's responsibility for service lines. That section requires a customer to "keep the service line in good repair and in accordance with such reasonable requirements of the utility as may be incorporated in its rules and regulations." If leaks are occurring on service lines owned by the park owner, the owner is responsible for loss of water resulting from same.

I hope this information has been of assistance to you. If you have any further questions, please contact Kathleen Dorman, staff attorney, at (502) 564-4596.

Sincerely,


Lee M. MacCracken
Executive Director

LMM/mdk

Enclosure

14. State whether Hardin County has informed all MHC's of their opportunity to intervene in the proceeding before the Commission.

ANSWER: When the legal counsel for the District filed the proposed tariff, he was not intending to file the final tariff, but a proposed tariff to enact a new case and response from the Commission, from which the District would develop a final, modified tariff. This was after a Commission staff conference held on August 22, 2007 (ref. preceding Case No. 2007-00246). As the proposed tariff did not include new or revised rates, the District did not believe that 807 KAR 5:011, Section 8, applied to this proposed tariff filing.

The District also understood that the Commission would most likely require a hearing on this tariff and proposed change, in which case public notice would have to be made in accordance with 807 KAR 5:011, Section 4.

The District is not opposed to re-filing a final, revised tariff, and making public notice to allow intervenors to submit testimony on the proposed tariff. The District's Board, however, is concerned about selectively choosing who to mail a specific notice to, or what MHC owners should receive a personal notice, without allowing all its customer base to have the same notice provided, in order to comment on the proposed tariff and changes. As mentioned in answer 6, the MHC owners are not currently customers of the District, so the District may not have a list of latest owners and current mailing addresses. For this reason also, the District prefers to make any public notice through standard means in accordance with 807 KAR 5:011, Section 4 and 8.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

15. a. State whether any MHCs have requested assistance from Hardin County in locating leaks within their water lines.
- b. If so, state how the district handled these requests
- c. Describe the assistance that Hardin County could provide and the costs for such assistance.

- ANSWER:
- a. Yes, there were five (5) cases in which the District provided assistance in locating water leaks in MHCs;
- b. Parkside MHC - The District was contacted by Ms. Stephanie Wiseman, owner, 1855 Wilson Road and ask if the District would assist in finding leaks in the MHC. At direction of the District's Board, District staff contacted Kentucky Rural Water Association (KRWA) and asked if KRWA would conduct a leak survey in the MHC. KRWA agreed to do so at no charge to the District or the MHC. The District and Ms. Wiseman executed an agreement and the first phase of the survey was conducted on 18 January, 2008. The resulting report and a copy of the agreement is attached. KRWA did not charge for the survey. The second phase is scheduled for March 2008, as weather permits.
- Homestead - District staff met with Jerry of Homestead MHC on 27 August, 2007. Staff discussed possible methods and suggestions for locating leaks.
- Park Valley - District staff met with Stacey Haas, the park's maintenance man, on 28 August, 2007. District staff informed Mr. Haas of possible methods for locating leaks. Staff also informed Mr. Haas of two (2) possible leaks that were visually found while District staff was driving to the meeting.
- Paradise MHP: On October 4, 2007, the owner, Mr. DeRuiter called and asked that we check his meter to make sure we were getting correct reading. Mr. Bruce and Mr. Pyles of the District drove to the master meter and re-read meter and recorded the flow rate, and responded by letter dated October 10, 2007. We also called Mr. DeRuiter and asked if we could assist him in looking for leaks. He responded that he did not need assistance, but he and his son would continue looking for leaks.
- Rainbow MHP: On or about October 19, 2007 the owner called us and said he suspected several tenants were stealing water, causing leaked water amount to seem higher. He provided a list of trailers that were occupied which we compared with our list of active accounts. After determining that about six occupied trailers did not have an account with the District (14% of lots in park), those services were turned off and meters removed. Mr. Brett Pyles contacted Radcliff Assistant Police Chief William Wells. On November 28, 2007 two Radcliff police officers met Mr. Pyles and two other District employees at Rainbow MHP and made contact with the persons that did not have an account with the District but were using water. Two of the renters came in to the District and signed re-payment plans and opened accounts (see attached). The others apparently moved out without contacting the District or paying for back charges. (The owner believed the District should be checking this on a regular basis. However, the District does not have manpower, or believes it should hire more persons, to monitor about 900 lots/renters to see if new persons have moved in or out, and have come in to District office to open an account)
- c. The District has incurred no cost for providing assistance other than the time of the employee(s) providing assistance.

WITNESS: Mr. Brett Pyles, Operations Manager, HCWD1

AGREEMENT

THIS AGREEMENT, made and entered into this 24th day of December, 2007, by and between the HARDIN COUNTY WATER DISTRICT No. 1 hereinafter referred to as the "District", and STEFANIE WISEMAN, AS TRUSTEE OF THE LYNWOOD WISEMAN INTERVIVOS TRUST, DATED MARCH 9, 1995, AS AMENDED, herein after referred to as the "Owner",


WITNESSETH

WHEREAS, the District has offered, free of charge to the Owner, to engage the Kentucky Rural Water Association ("Association") to provide professional personnel and equipment in leak detection services ("service") to assist the Owner with possibly locating water leaks within the private water lines and on the private property of the Owner, at a Mobile Home Park known as Parkside Manor located in Radcliff, Kentucky, and which said service is intended to eventually reduce the un-billed and leaking and unaccounted for water within the Owner's property, the District and Owner herein agree to the following stipulations and understandings;


1. The District and Owner understand that the District is not obligated in any way to provide said service, and that the District is only agreeing to assist because the alleged leaks within the Owner's property contribute to what the District believes is the largest single unaccounted source of leaks occurring on private property, and said alleged leaks and water use is currently not being paid for, but the District and its customers are incurring the cost to produce and deliver water onto the Owner's property.
2. The District and Owner understand that the service provided by the Association is to generally suggest or direct where leaks may be occurring underground, but that there is no guarantee provided by the District or the Association that leaks will be exactly at the points suggested, or that the listening devices or tools have actually located a water leak, but may be caused by another sound source or anomaly.
3. The Owner shall allow the District and Association personnel reasonable access to enter onto its property, and park equipment and access any part of the property necessary to provide the service, and the Owner agrees to also provide one of its employees to be available and assist and direct the District and Association personnel while carrying out the service.
4. The District and Owner agree that if, after performance of the service by the District and Association that all parties hereto agree there is sufficient evidence or data that suggests or points to a source of a leak, that Owner will make a good faith effort to have the leak or possible leaks investigated and repaired, at its expense in order to reduce the amount of water leaking from the Owner's pipes and plumbing.

5. The Owner agrees to indemnify and save the District and Association harmless from and against all claims, demands, liability, damages, suits, actions or causes of action of every kind and nature, which may be brought or asserted against the District and Association arising out of errors or omissions of the District and Association in the performance of the service, except those arising from the negligent or intentional acts of the District or Association.

By signing below, the District and Owner acknowledge that they have read all of the conditions above, and agree to the terms and conditions therein;

 12.19.07
Signature, Owner LYNWOOD WISEMAN Date
INTER VIVOS TRUST

STEFANIE WISEMAN TRUSTEE
Printed Name, Owner

 Dec. 19, 2007
Witness Date

Michael L. Covey
Printed Name, Witness

 12-24-07
Signature, District Date

Brett Pyles, Operations Manager
Printed Name / Title, District

Brett Pyles

From: Richard Stranahan
Sent: Thursday, March 06, 2008 2:49 PM
To: Brett Pyles
Subject: FW: Leak detection at parkside

From: Dell Harris [mailto:d.harris@krwa.org]
Sent: Thursday, March 06, 2008 2:27 PM
To: Richard Stranahan
Subject: Leak detection at parkside

Richard,

I will detail, per your request, my on site assessment of Parkside MHP.

A significant leak was pinpointed near lot 225. I estimate this leak at 15-17 gallons per minute. This leak is a significant source of loss of revenue and capacity. This would cost a system \$18,000 per year at \$2.00 per 1,000 gallons purchase/production cost. The rupture also compromises the sanitary integrity of the system.

I now have the DLD digital listening device with the indexing feature. I will call you to reschedule a listening survey of Parkside MHP. There were 3 sites that need to be looked at again lots # 371, 386,395.

Dell Harris
cell 270-535-5925

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

AGREEMENT

The undersigned, Danna Neustadter acknowledge that theft of water and sewer service occurred at least once at my address at 360 Hill St, Lot 45 in Radcliff. The District has agreed to drop criminal charges available under Kentucky statutes 514.060 if we agree that we will not again violate this statute and cause water or sewer serve to be provided by theft at any time in the future. Should we violate this agreement, we understand that the District may, and most likely will file criminal charges to the fullest extent of the law and that we will incur added charges including all fees approved by the Public Service Commission of Kentucky, the City of Radcliff and any other court costs. In addition, we have agreed to pay all outstanding charges including added penalties and fees.

Signed:

Danna Neustadter

Date Signed: 11-28-07

Accepted; Hardin County Water District No. 1

Jim Bruce, General Manager

Phone 1-270-351-3222

FAX: 1-270-352-3055

Hardin County Water District No. 1

Serving Radcliff and Hardin County for Over 50 Years

1400 Rogersville Road
Radcliff, KY. 40160

AGREEMENT

The undersigned, Christine M. Mikel acknowledge that theft of water and sewer service occurred at least once at my address at 360 Hills + Lot 46 in Radcliff. The District has agreed to drop criminal charges available under Kentucky statutes 514.060 if we agree that we will not again violate this statute and cause water or sewer serve to be provided by theft at any time in the future. Should we violate this agreement, we understand that the District may, and most likely will file criminal charges to the fullest extent of the law and that we will incur added charges including all fees approved by the Public Service Commission of Kentucky, the City of Radcliff and any other court costs. In addition, we have agreed to pay all outstanding charges including added penalties and fees.

Signed:

Christine M. Mikel

Date Signed: Jan 3, 2008

Accepted; Hardin County Water District No. 1

Jim Bruce, General Manager

Phone 1-270-351-3222

(Chanda)
FAX: 1-270-352-3055

16. Refer to 807 KAR 5:066, Sections 1 and 12, which provide that a customer shall maintain the water line from the meter to the point of consumption. State why it is Hardin County's position that the district should not be responsible for maintaining all water lines up to a customer's individual meter.

ANSWER: See answer to 11, b. The District believes that Sections 1 and 12 are intended to apply to a normal water main / meter location situation where the meter has been placed in accordance with Section 12. The District believes that the individual meters were installed without proper Commission approval, in contradiction to Section 12, or approved tariff change, and that this has created a unique and difficult situation which needs to be remedied, and does not fit the normal description of Sections 1 and 12.

As the District has explained, the original master meter location did comply with Sections 1 and 12, and for many years was used for billing. It was not until MHC owners were allowed to install their own meters, directly connected to their private water lines, did it become impossible to directly apply the intent of Sections 1 and 12. The lines within the MHC have, and continue to be, owned, maintained and repaired by the MHC and not the District. These mains lie within private property, without easements, nor have been turned over, sold or given to the District, nor to the District's knowledge, were ever installed according to the District, Division of Water or other public construction standards for water mains. Some MHC may have a dozen residents, all served by a 3/4 inch service line within the MHC, which is undersized by any measure as a shared water main. The District has no records of these mains, installation, easements, design drawings, permits or other information about these private water mains, located on private property.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

17. Refer to Hardin County's current tariff, Sheet 7, Meter Connections, No. 9.

- a. State whether the proposed tariff provisions would conflict with this current position.
- b. If so, state Hardin County's position regarding how the current provision should be amended.

ANSWER: a. No. The District has filed this proposed tariff to address and rectify the problem it has with individual meters, located within private property, and away from the public water mains, which are currently not in agreement with Sheet 7, No. 9.

- b. The District believes, after several years of discussion and research, that its proposed tariff best addresses the existing sub-meters, downstream of master meters and on private property. Since Sheet 7, No. 9 was approved in 2000, the District has not allowed any new meter installations in conflict with this section. The District does not believe Sheet 7, No. 9 should be amended, but does believe its proposed tariff does address the problem of the existing meters installed on private property, and connected to private water lines.

WITNESS: Mr. Jim Bruce, General Manager, HCWD1

18. State whether, if approved, the provisions of this proposed tariff would create a new customer class for Hardin County under Sheet 9 of its current tariff.

ANSWER: In the sense that these customers may be treated different for waiver of deposits, amount of deposits, or notice of service interruption, yes, these customers could be considered as a different class. If required or recommended by the Commission, the District would not be opposed to adding a fourth definition or customer class definition under Sheet 9 (8?) of its tariff. This definition might state; "Pre-Existing Master Meter Customer - *Those customers which own property which have a master meter installed for the property, but also have sub-meters installed on private property, which are used to bill individual tenants, and to which the tariff section for which Private Property Master Meter Billing apply*".

WITNESS: Mr. Jim Bruce, General Manager, HCWD1