

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

PEGGY HOWELL,  
KOUNTRY CAFÉ

COMPLAINANT

CASE NO. 2011-00426

vs.

UTILITIES INC.  
d/b/a WATER SERVICES CORP  
OF KENTUCKY

DEFENDANT

RECEIVED

NOV 14 2011

PUBLIC SERVICE  
COMMISSION

**ANSWER**

Water Service Corporation of Kentucky, (WSCK), by counsel for its answer to the Complaint states.

The Complaint alleges three issues for Commission review:

1. Complainant has on several occasions received two bills from the Defendant that are due within the same month. Complainant received a bill due January 3, 2011. Complainant received a second bill due. January 28, 2011.

2. Complainant received a bill due May 1<sup>st</sup> (a Sunday). It was paid at Clinton City Hall, Defendant's collection agent, on Monday May 2<sup>nd</sup>. Complainant received a second bill due on May 26, 2011.

3. Complainant's usage fluctuates wildly. Her bill in May 2011 showed usage of 688 gallons of water per day for eight days. Her bill for September 2011 showed usage of 206 gallons daily.

The Complaint requests that the Commission stop the practice of two bills being due in the same month and a review of billing and overcharges.

Dealing with the issues in reverse order, starting with the issue of fluctuating usage, the two months that are referenced in the Complaint predate the public hearing in Clinton in Case No. 2010-00476 which was held on June 22, 2011. At that hearing, Bruce Haas, Regional Director of Operations for the Mid-West Region

of Utilities, Inc., discussed in detail the factors that led to a one-time miscalculation of average water usage. His discussion of that issue, which is included in the Commission's video recording of the public hearing is incorporated by reference into this Answer. (See Video Clinton Public Hearing, June 22, 2011, @ 14:00)

He explained that when WSCK switched from the old meters to the new AMR meters in the spring of 2011, there was a period of the monthly billing cycle that included readings from both the old switched out meters and the new replacement meters. This occurred in April, 2011. During that month there were 8 days of usage on the new meter and 22 days of usage on the old meter included in the monthly bill calculation. The total month's usage calculations (total usage divided by number of days) only used the 8 days usage registered on the new meter. That calculation incorrectly gave the impression that the usage per day was very high, but that number was a one-time occurrence. The only item on the bill affected by this error was the average daily usage. The total usage and the billed usage were not affected and were correct. Attached is a schedule showing the average monthly usage and billing for the Complainant's business, which confirms that the billings have been consistent since the April miscalculation. Also attached are all of the Complainant's bills from October, 2010 to November, 2011.

Because this issue was explained in detail at the public hearing, which was attended by counsel for Complainant, and because there have been no other billing periods since the April error which have experienced the same error, it is obvious that the error has been corrected and that there is no further action by WSCK that can be taken to resolve the issue. WSCK is unaware of any complaints from its customers about this issue since the June public hearing.

In addition to the discussion of this issue at the public meeting, representatives of WSCK responded to a complaint filed with the Commission on June 30, 2011 by the Complainant. Attached is correspondence from WSCK to the Commission staff about this same issue. According to that correspondence, both Howell and her attorney were satisfied with the explanation and no further action was needed. The Commission did not require any additional action by WSCK to resolve the matter.

This is now the third time the same explanation has been provided. There is nothing additional that can be said or any other way to explain the one time discrepancy in one line item in one month's bill. Complainant has yet to explain how that discrepancy affected her bill or what harm – financial or otherwise - was caused by this minor error.

Issues one and two deal with the same concern – multiple bills in one month. The attached bills and schedule of bills show that there is only one bill issued for each monthly billing period. Because of the timing of the bills, holidays, or delays in completing the bills for mailing, the due date for one month's bill could extend into the next month. While it is possible that two due dates fall within a single month, the customer only receives one bill per billing period, i.e. one bill per month and twelve bills per year. The balance due for each bill reflects the actual amount due for that billing period and the payment credited for the prior billing period. There is no double billing or failure to credit any payment.

The Complaint asks the Commission to review the bills. This information provided in this Answer allows that review. The information also confirms that there are no issues which can be considered a violation of any Commission regulation or any WSCK tariff.

The remedy the Complainant seems to want, namely bills that follow a strict 30 day mailing/payment schedule would require a major reprogramming of the Company's software and create significant administrative problems, not to mention the cost of such unnecessary actions. The practices of WSCK mirror those of all other utilities. Billing dates, due dates and payment dates do not always fall within a strict timeframe. It should be noted that there is no complaint about being unable to make the payments or of being assessed late payment fees or of excessive or duplicate bills. The issue is only that the due dates do not coincide with Complainant's preconceived notion of billing symmetry. Any action by the Commission to satisfy the Complaint would lead to serious disruption of the WSCK's billing practices and interject the Commission into the daily operations of the Company.

The Commission has original jurisdiction over the rates and services of jurisdictional utilities and may enter an Order affecting the rates and services of a utility. However, the Commission is also reluctant to order drastic changes in business practices absent compelling evidence that, but for those changes, a utility's customers will seriously suffer. Case No. 2003-00400, Order dated March 23, 2005, page 9.

There is no evidence that any customer has suffered, much less seriously.

Administrative Regulation 807 KAR 5:001, Section 12(4)(a), requires the Commission to review each formal complaint upon its filing to determine whether the complaint establishes a *prima facie* case. A complaint establishes a *prima facie* case when, on its face, it states sufficient allegations that, if uncontradicted by other evidence, would entitle the complainant to the requested relief. If a complaint fails to establish a *prima facie* case, it may be dismissed. Case No. 2005-00451, Order dated February 6, 2006, page 1.

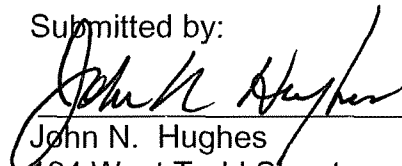
One of the issues in the Complaint deals with a matter that was resolved six months ago. The other issues deal with the administrative reality of the timing of the preparation, mailing, receipt and payment of bills. There is

no allegation of erroneous billing, over-billing, inappropriate accounting of payments or any other issue that might amount to a prima facie allegation of wrong by the Company. The attached bills and schedule show that the Complainant received one bill per billing period, that the average usage since April, 2011 has been consistent and that there are no other irregularities in the bills.

The relief sought by the Complainant is a refund of overpayments. Yet, there is no allegation much less proof of any overpayments or any other evidence that suggests that there is a billing error that would result in any overpayment.

Based on the facts presented in the Answer, WSCK has satisfied the issues raised in the Complaint, which should be dismissed.

Submitted by:

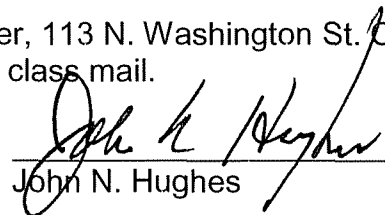


John N. Hughes  
124 West Todd Street  
Frankfort, Kentucky 40601  
(502) 227-7270 (T)

Attorney for Water Service  
Corporation of Kentucky

Certificate of Service:

A copy of this answer was mailed to Mary Potter, 113 N. Washington St. Clinton, KY 42031, the 14<sup>th</sup> day of November, 2011 by first class mail.



John N. Hughes

ATTACHMENT 1

**Kountry Café**  
**105 N Washington, Clinton, KY**  
**A/C 1111610000**

Bill Date	Due Date	Actual Usage (Gals)	Average Usage (Gals)	Current Month Charges
10/3/2010	10/28/2010	5300	177	\$ 87.29
11/1/2010	11/26/2010	5700	173	\$ 93.05
12/1/2010	12/27/2010	4800	171	\$ 80.09
1/3/2011	1/28/2011	4100	146	\$ 70.01
2/1/2011	2/28/2011	5200	149	\$ 85.85
3/1/2011	3/28/2011	4700	157	\$ 78.65
4/6/2011	5/2/2011	5500	162*	\$ 90.18
5/1/2011	5/26/2011	5000	179	\$ 82.97
6/1/2011	6/27/2011	4900	175	\$ 81.53
7/4/2011	7/29/2011	5800	181	\$ 94.49
8/1/2011	8/26/2011	4000	160	\$ 68.57
9/6/2011	10/3/2011	5800	187	\$ 94.49
10/2/2011	10/27/2011	6600	206	\$ 105.99
11/2/2011	11/28/2011	5500	196	\$ 90.18

\* WSC of KY converted all water meters to an AMR meter type. The 4/6/2011 bill showed two separate meter usage information. Unfortunately, the line item on the bill relating to the "Average Day Use" only used the number of days of service that the new AMR meter had been installed to calculate the daily average from the entire month's usage that appeared on the bill. The total number of days in service for both meters was not used in the calculation. The "Average Day Use" is for reference purpose only and is not used in the calculation of the billed charges. The invoice amount and total usage billed were correct.

ATTACHMENT 2





**Water Service Corp of Kentucky**  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

<b>Bill Date</b>	<b>Account Number</b>	<b>Due Date</b>	<b>Please Pay:</b>
10/03/2010	1111610000	10/28/2010	\$87.29

Name **KOUNTRY CAFE** Primary Telephone #

Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$84.41
Payments received as of 10/03/2010	\$-84.41
Balance as of 10/03/2010	\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64
Next 4,300 gallons at \$6.59 per 1,000 gallons	\$28.34
City School Tax at 3%	\$1.20
Kentucky State Tax at 6%	\$2.40
Total Commercial Water Service	\$43.58

**City of Clinton Commercial Wastewater Service**

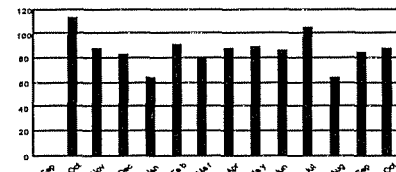
Kentucky State Tax at 6%	\$2.47
Total City of Clinton Commercial Wastewater Service	\$43.71

**Total Amount Due \$87.29**

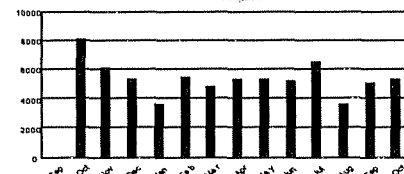
**Summary of Service**

Meter Reading	Meter #	6057
Current	402800	09/24/2010
Previous	397500	08/25/2010
Usage	5,300 Gallons	
Number of Days:	30	
Average Daily Use:	177 Gallons	
Average Daily Cost:	\$2.91	

**Billing History**  
in dollars



**Consumption History**  
in gallons



**The payment for this bill is due upon receipt.**  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000

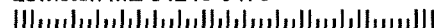
Due Date: 10/28/2010

Please Pay: **\$87.29**

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back



Water Service Corp of Kentucky  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

<b>Bill Date</b>	<b>Account Number</b>	<b>Due Date</b>	<b>Please Pay:</b>
11/01/2010	1111610000	11/26/2010	\$93.05

Name **KOUNTRY CAFE** Primary Telephone #

Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$87.29	
Payments received as of 11/01/2010	\$-87.29	
Balance as of 11/01/2010		\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64	
Next 4,700 gallons at \$6.59 per 1,000 gallons	\$30.97	
City School Tax at 3%	\$1.28	
Kentucky State Tax at 6%	\$2.56	
Total Commercial Water Service		\$46.45

**City of Clinton Commercial Wastewater Service**

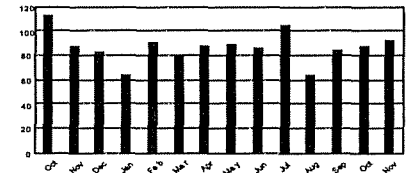
Kentucky State Tax at 6%	\$2.64	
Total City of Clinton Commercial Wastewater Service		\$46.60

**Total Amount Due \$93.05**

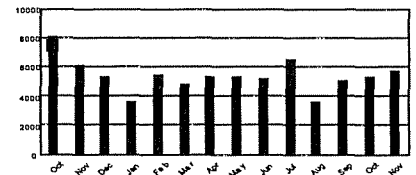
**Summary of Service**

Meter Reading	Meter #	6057
Current	408500	10/27/2010
Previous	402800	09/24/2010
Usage	5,700 Gallons	
Number of Days:	33	
Average Daily Use:	173 Gallons	
Average Daily Cost:	\$2.82	

**Billing History**  
in dollars



**Consumption History**  
in gallons



The payment for this bill is due upon receipt.  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000

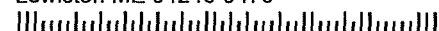
Due Date: 11/26/2010

Please Pay: **\$93.05**

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back



**Water Service Corp of Kentucky**  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

<b>Bill Date</b>	<b>Account Number</b>	<b>Due Date</b>	<b>Please Pay:</b>
12/01/2010	1111610000	12/27/2010	\$80.09

Name **KOUNTRY CAFE** Primary Telephone #

Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$93.05
Payments received as of 12/01/2010	\$-93.05
Balance as of 12/01/2010	\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64
Next 3,800 gallons at \$6.59 per 1,000 gallons	\$25.04
City School Tax at 3%	\$1.10
Kentucky State Tax at 6%	\$2.20
Total Commercial Water Service	\$39.98

**City of Clinton Commercial Wastewater Service**

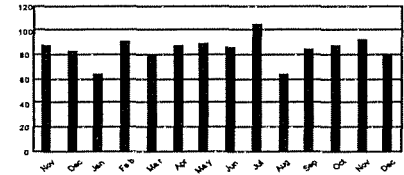
Kentucky State Tax at 6%	\$2.27
Total City of Clinton Commercial Wastewater Service	\$40.11

**Total Amount Due \$80.09**

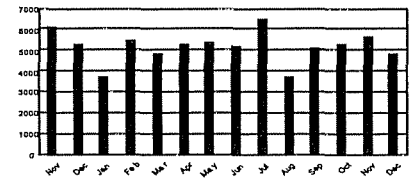
**Summary of Service**

Meter Reading	Meter #	6057
Current	413300	11/24/2010
Previous	408500	10/27/2010
Usage	4,800 Gallons	
Number of Days:	28	
Average Daily Use:	171 Gallons	
Average Daily Cost:	\$2.86	

**Billing History**  
in dollars



**Consumption History**  
in gallons



**The payment for this bill is due upon receipt.**  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

We are pleased to announce the launch of our new Web Self-Service site. The site will allow you to obtain current and historical account information. The site may be accessed by going to <http://www.uiwater.com/myaccount>

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000 Amount Paid  
 Due Date: 12/27/2010  
 Please Pay: \$80.09

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476

Address correction requested on back



Water Service Corp of Kentucky  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

<b>Bill Date</b>	<b>Account Number</b>	<b>Due Date</b>	<b>Please Pay:</b>
01/03/2011	1111610000	1/28/2011	\$70.01

Name **KOUNTRY CAFE** Primary Telephone #

Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$80.09
Payments received as of 01/03/2011	\$-80.09
Balance as of 01/03/2011	\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64
Next 3,100 gallons at \$6.59 per 1,000 gallons	\$20.43
City School Tax at 3%	\$0.96
Kentucky State Tax at 6%	\$1.92
Total Commercial Water Service	\$34.95

**City of Clinton Commercial Wastewater Service**

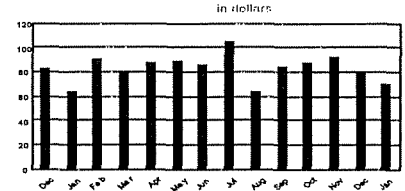
Kentucky State Tax at 6%	\$1.98
Total City of Clinton Commercial Wastewater Service	\$35.06

**Total Amount Due \$70.01**

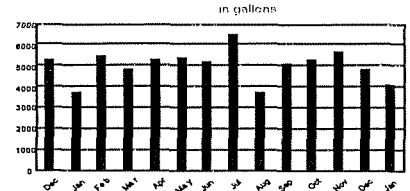
**Summary of Service**

<b>Meter Reading</b>	<b>Meter #</b>	6057
Current	417400	12/22/2010
Previous	413300	11/24/2010
Usage	4,100 Gallons	
Number of Days:	28	
Average Daily Use:	146 Gallons	
Average Daily Cost:	\$2.50	

**Billing History**



**Consumption History**



The payment for this bill is due upon receipt.  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000

Due Date: 1/28/2011

Please Pay: \$70.01

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back



Water Service Corp of Kentucky

Phone: (800) 272-1919

Collections: (800) 272-1919

Customer Service: (800) 272-1919

www.uiwater.com

<b>Bill Date</b> 02/01/2011	<b>Account Number</b> 1111610000	<b>Due Date</b> 2/28/2011	<b>Please Pay:</b> \$85.85
--------------------------------	-------------------------------------	------------------------------	-------------------------------

Name **KOUNTRY CAFE** Primary Telephone #

Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$70.01
Payments received as of 02/01/2011	-\$70.01
Balance as of 02/01/2011	\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64
Next 4,200 gallons at \$6.59 per 1,000 gallons	\$27.68
City School Tax at 3%	\$1.18
Kentucky State Tax at 6%	\$2.36
Total Commercial Water Service	\$42.86

**City of Clinton Commercial Wastewater Service**

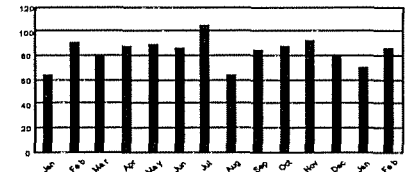
Kentucky State Tax at 6%	\$2.43
Total City of Clinton Commercial Wastewater Service	\$42.99

**Total Amount Due \$85.85**

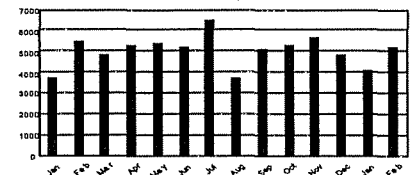
**Summary of Service**

<b>Meter Reading</b>	<b>Meter #</b> 6057
Current	422600 01/26/2011
Previous	417400 12/22/2010
Usage	5,200 Gallons
Number of Days:	35
Average Daily Use:	149 Gallons
Average Daily Cost:	\$2.45

**Billing History**  
in dollars



**Consumption History**  
in gallons



**The payment for this bill is due upon receipt.**  
Make check payable to: Water Service Corp of Kentucky

**Messages**

Paperless billing is now available. Please visit our Web Self Service site where you can obtain account information and register for paperless billing. The site may be accessed by going to <http://www.uiwater.com/myaccount>.

067



PO BOX 160609  
Altamonte Springs, FL 32716



Account Number: 1111610000  
Due Date: 2/28/2011  
Please Pay: **\$85.85**

Amount Paid

KOUNTRY CAFE  
105 N WASHINGTON  
CLINTON KY 42031

Water Service Corp of Kentucky  
PO Box 11025  
Lewiston ME 04243-9476

Address correction requested on back



**Water Service Corp of Kentucky**  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uewater.com

<b>Bill Date</b>	<b>Account Number</b>	<b>Due Date</b>	<b>Please Pay:</b>
03/01/2011	1111610000	3/28/2011	\$78.65

Name **KOUNTRY CAFE** Primary Telephone #  
 Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$85.85	
Payments received as of 03/01/2011	\$-85.85	
Balance as of 03/01/2011		\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64	
Next 3,700 gallons at \$6.59 per 1,000 gallons	\$24.38	
City School Tax at 3%	\$1.08	
Kentucky State Tax at 6%	\$2.16	
Total Commercial Water Service		\$39.26

**City of Clinton Commercial Wastewater Service**

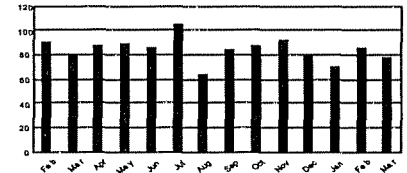
Kentucky State Tax at 6%	\$2.23	
Total City of Clinton Commercial Wastewater Service		\$39.39

**Total Amount Due \$78.65**

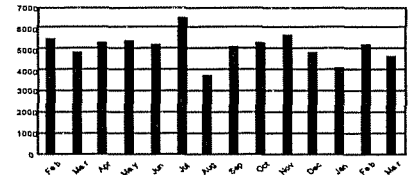
**Summary of Service**

<b>Meter Reading</b>	<b>Meter #</b>	6057
Current	427300	02/25/2011
Previous	422600	01/26/2011
Usage	4,700 Gallons	
Number of Days:	30	
Average Daily Use:	157 Gallons	
Average Daily Cost:	\$2.62	

**Billing History**  
in dollars



**Consumption History**  
in gallons



**The payment for this bill is due upon receipt.**  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

Paperless billing is now available. Please visit our Web Self Service site where you can obtain account information and register for paperless billing. The site may be accessed by going to <http://www.uewater.com/myaccount>.

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000  
 Due Date: 3/28/2011  
 Please Pay: **\$78.65**

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back



**Water Service Corp of Kentucky**  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

<b>Bill Date</b>	<b>Account Number</b>	<b>Due Date</b>	<b>Please Pay:</b>
04/06/2011	1111610000	5/2/2011	\$90.18

Name **KOUNTRY CAFE** Primary Telephone #

Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$78.65	
Payments received as of 04/06/2011	\$-78.65	
Balance as of 04/06/2011		\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64	
Next 4,500 gallons at \$6.59 per 1,000 gallons	\$29.66	
City School Tax at 3%	\$1.24	
Kentucky State Tax at 6%	\$2.48	
Total Commercial Water Service		\$45.02

**City of Clinton Commercial Wastewater Service**

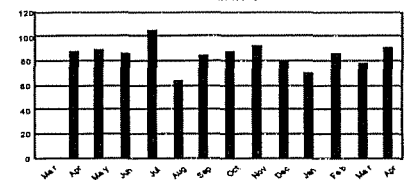
Kentucky State Tax at 6%	\$2.56	
Total City of Clinton Commercial Wastewater Service		\$45.16

**Total Amount Due \$90.18**

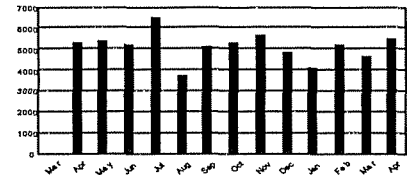
**Summary of Service**

<b>Meter Reading</b>	<b>Meter #</b>	6057
Current	431500	03/23/2011
Previous	427300	02/25/2011
Usage	4,200 Gallons	
Number of Days:	26	
<b>Meter Reading</b>	<b>Meter #</b>	7317
Current	13	03/31/2011
Previous	0	03/23/2011
Usage	13 Units	
Number of Days:	8	
Average Daily Use:	688 Gallons	
Average Daily Cost:	\$11.27	

**Billing History**  
in dollars



**Consumption History**  
in gallons



**The payment for this bill is due upon receipt.**  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

Paperless billing is now available. Please visit our Web Self Service site where you can obtain account information and register for paperless billing. The site may be accessed by going to <http://www.uiwater.com/myaccount>.

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000

Due Date: 5/2/2011

Please Pay: **\$90.18**

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back



Water Service Corp of Kentucky  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uewater.com

<b>Bill Date</b>	<b>Account Number</b>	<b>Due Date</b>	<b>Please Pay:</b>
05/01/2011	1111610000	5/26/2011	\$173.15

Name **KOUNTRY CAFE** Primary Telephone #

Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$90.18
Payments received as of 05/01/2011	\$0.00
Balance as of 05/01/2011	\$90.18

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64
Next 4,000 gallons at \$6.59 per 1,000 gallons	\$26.36
City School Tax at 3%	\$1.14
Kentucky State Tax at 6%	\$2.28
Total Commercial Water Service	\$41.42

**City of Clinton Commercial Wastewater Service**

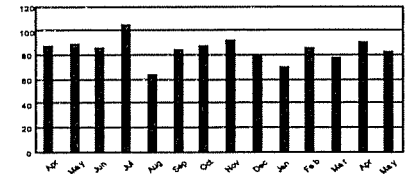
Kentucky State Tax at 6%	\$2.35
Total City of Clinton Commercial Wastewater Service	\$41.55

**Total Amount Due \$173.15**

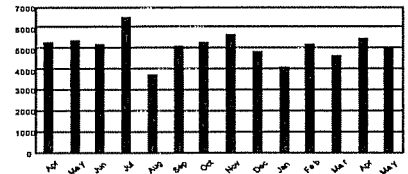
**Summary of Service**

<b>Meter Reading</b>	<b>Meter #</b>	7317
Current	63	04/28/2011
Previous	13	03/31/2011
Usage	50 Units	
Number of Days:	28	
Average Daily Use:	179 Gallons	
Average Daily Cost:	\$2.96	

**Billing History**  
in dollars



**Consumption History**  
in gallons



**The payment for this bill is due upon receipt.**  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

Our records indicate the prior balance remains unpaid and your account may be subject to disconnection. Please note the due date on this bill refers to the current bill amount and does not extend the time allowed for payment of the prior balance. Paperless billing is now available. Please visit our Web Self Service site where you can obtain account information and register for paperless billing. The site may be accessed by going to <http://www.uewater.com/myaccount>.

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000

Due Date: 5/26/2011

Please Pay: **\$173.15**

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back





**Water Service Corp of Kentucky**  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

<b>Bill Date</b> 06/01/2011	<b>Account Number</b> 1111610000	<b>Due Date</b> 6/27/2011	<b>Please Pay:</b> \$81.53
--------------------------------	-------------------------------------	------------------------------	-------------------------------

Name **KOUNTRY CAFE** Primary Telephone #  
 Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance \$173.15  
 Payments received as of 06/01/2011 \$-173.15  
 Balance as of 06/01/2011 \$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge \$11.64  
 Next 3,900 gallons at \$6.59 per 1,000 gallons \$25.70  
 City School Tax at 3% \$1.12  
 Kentucky State Tax at 6% \$2.24  
 Total Commercial Water Service \$40.70

**City of Clinton Commercial Wastewater Service**

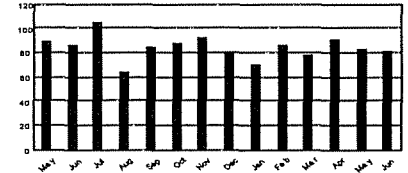
Kentucky State Tax at 6% \$2.31  
 Total City of Clinton Commercial Wastewater Service \$40.83

**Total Amount Due \$81.53**

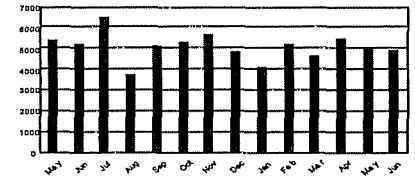
**Summary of Service**

**Meter Reading** Meter # 7317  
 Current 112 05/26/2011  
 Previous 63 04/28/2011  
 Usage 49 Units  
 Number of Days: 28  
 Average Daily Use: 175 Gallons  
 Average Daily Cost: \$2.91

**Billing History**  
in dollars



**Consumption History**  
in gallons



**The payment for this bill is due upon receipt.**  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

Paperless billing is now available. Please visit our Web Self Service site where you can obtain account information and register for paperless billing. The site may be accessed by going to <http://www.uiwater.com/myaccount>.

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000 Amount Paid  
 Due Date: 6/27/2011  
 Please Pay: \$81.53

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476

Address correction requested on back



**Water Service Corp of Kentucky**  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

<b>Bill Date</b>	<b>Account Number</b>	<b>Due Date</b>	<b>Please Pay:</b>
07/04/2011	1111610000	7/29/2011	\$94.49

Name **KOUNTRY CAFE** Primary Telephone #

Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$81.53	
Payments received as of 07/04/2011	\$-81.53	
Balance as of 07/04/2011		\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64	
Next 4,800 gallons at \$6.59 per 1,000 gallons	\$31.63	
City School Tax at 3%	\$1.30	
Kentucky State Tax at 6%	\$2.60	
Total Commercial Water Service		\$47.17

**City of Clinton Commercial Wastewater Service**

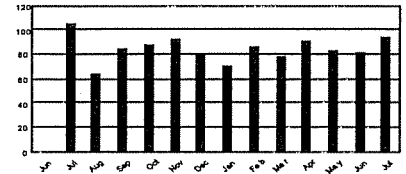
Kentucky State Tax at 6%	\$2.68	
Total City of Clinton Commercial Wastewater Service		\$47.32

**Total Amount Due \$94.49**

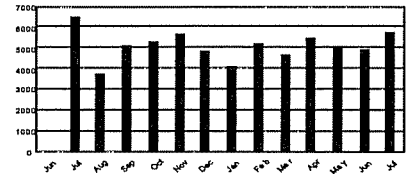
**Summary of Service**

Meter Reading	Meter #	7317
Current	170	06/27/2011
Previous	112	05/26/2011
Usage	58 Units	
Number of Days:	32	
Average Daily Use:	181 Gallons	
Average Daily Cost:	\$2.95	

**Billing History**  
in dollars



**Consumption History**  
in gallons



**The payment for this bill is due upon receipt.**  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

Paperless billing is now available. Please visit our Web Self Service site where you can obtain account information and register for paperless billing. The site may be accessed by going to <http://www.uiwater.com/myaccount>.

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000

Due Date: 7/29/2011

Please Pay: \$94.49

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back



**Water Service Corp of Kentucky**  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uewater.com

<b>Bill Date</b> 08/01/2011	<b>Account Number</b> 1111610000	<b>Due Date</b> 8/26/2011	<b>Please Pay:</b> \$68.57
--------------------------------	-------------------------------------	------------------------------	-------------------------------

Name **KOUNTRY CAFE** Primary Telephone #  
 Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$94.49	
Payments received as of 08/01/2011	\$-94.49	
Balance as of 08/01/2011		\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64	
Next 3,000 gallons at \$6.59 per 1,000 gallons	\$19.77	
City School Tax at 3%	\$0.94	
Kentucky State Tax at 6%	\$1.88	
Total Commercial Water Service		\$34.23

**City of Clinton Commercial Wastewater Service**

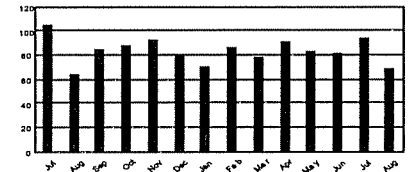
Kentucky State Tax at 6%	\$1.94	
Total City of Clinton Commercial Wastewater Service		\$34.34

**Total Amount Due \$68.57**

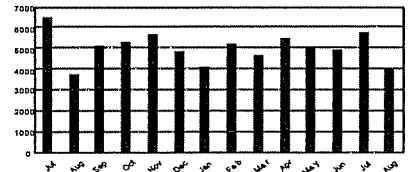
**Summary of Service**

<b>Meter Reading</b>	<b>Meter #</b>	7317
Current	210	07/22/2011
Previous	170	06/27/2011
Usage	40 Units	
Number of Days:	25	
Average Daily Use:	160 Gallons	
Average Daily Cost:	\$2.74	

**Billing History**  
in dollars



**Consumption History**  
in gallons



**The payment for this bill is due upon receipt.**  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000

Due Date: 8/26/2011

Please Pay: **\$68.57**

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back



**Water Service Corp of Kentucky**  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uewater.com

<b>Bill Date</b>	<b>Account Number</b>	<b>Due Date</b>	<b>Please Pay:</b>
09/06/2011	1111610000	10/3/2011	\$94.49

Name **KOUNTRY CAFE** Primary Telephone #  
 Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$68.57
Payments received as of 09/06/2011	\$-68.57
Balance as of 09/06/2011	\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64
Next 4,800 gallons at \$6.59 per 1,000 gallons	\$31.63
City School Tax at 3%	\$1.30
Kentucky State Tax at 6%	\$2.60
Total Commercial Water Service	\$47.17

**City of Clinton Commercial Wastewater Service**

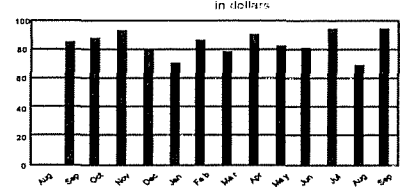
Kentucky State Tax at 6%	\$2.68
Total City of Clinton Commercial Wastewater Service	\$47.32

**Total Amount Due \$94.49**

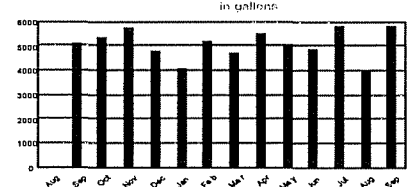
**Summary of Service**

<b>Meter Reading</b>	<b>Meter #</b>	7317
Current	268	08/22/2011
Previous	210	07/22/2011
Usage	58 Units	
Number of Days:	31	
Average Daily Use:	187 Gallons	
Average Daily Cost:	\$3.05	

**Billing History**



**Consumption History**



**The payment for this bill is due upon receipt.**  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000

Due Date: 10/3/2011

Please Pay: **\$94.49**

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back



Water Service Corp of Kentucky  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

<b>Bill Date</b>	<b>Account Number</b>	<b>Due Date</b>	<b>Please Pay:</b>
10/02/2011	1111610000	10/27/2011	\$200.48

Name **KOUNTRY CAFE** Primary Telephone #  
 Service Address **105 N WASHINGTON, CLINTON, KY, 42031**

**Activity Since Last Bill**

Previous Balance	\$94.49	
Payments received as of 10/02/2011	\$0.00	
Balance as of 10/02/2011		\$94.49

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64	
Next 5,600 gallons at \$6.59 per 1,000 gallons	\$36.90	
City School Tax at 3%	\$1.46	
Kentucky State Tax at 6%	\$2.91	
Total Commercial Water Service		\$52.91

**City of Clinton Commercial Wastewater Service**

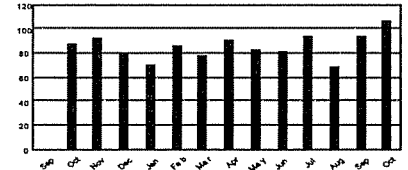
Kentucky State Tax at 6%	\$3.00	
Total City of Clinton Commercial Wastewater Service		\$53.08

**Total Amount Due \$200.48**

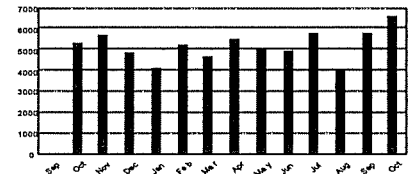
**Summary of Service**

<b>Meter Reading</b>	<b>Meter #</b>	7317
Current	334	09/23/2011
Previous	268	08/22/2011
Usage	66 Units	
Number of Days:	32	
Average Daily Use:	206 Gallons	
Average Daily Cost:	\$3.31	

**Billing History**  
in dollars



**Consumption History**  
in gallons



**The payment for this bill is due upon receipt.**  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

Our records indicate the prior balance remains unpaid and your account may be subject to disconnection. Please note the due date on this bill refers to the current bill amount and does not extend the time allowed for payment of the prior balance.

067



PO BOX 160609  
 Altamonte Springs, FL 32716

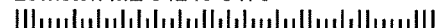


Account Number: 1111610000  
 Due Date: 10/27/2011  
 Please Pay: **\$200.48**

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back



Water Service Corp of Kentucky  
 Phone: (800) 272-1919  
 Collections: (800) 272-1919  
 Customer Service: (800) 272-1919  
 www.uiwater.com

<b>Bill Date</b> 11/02/2011	<b>Account Number</b> 1111610000	<b>Due Date</b> 11/28/2011	<b>Please Pay:</b> \$90.18
--------------------------------	-------------------------------------	-------------------------------	-------------------------------

Name **KOUNTRY CAFE** Primary Telephone #

Service Address 105 N WASHINGTON, CLINTON, KY, 42031

**Activity Since Last Bill**

Previous Balance	\$200.48	
Payments received as of 11/02/2011	\$-200.48	
Balance as of 11/02/2011		\$0.00

**Commercial Water Service**

Commercial Minimum Usage Charge	\$11.64	
Next 4,500 gallons at \$6.59 per 1,000 gallons	\$29.66	
City School Tax at 3%	\$1.24	
Kentucky State Tax at 6%	\$2.48	
Total Commercial Water Service		\$45.02

**City of Clinton Commercial Wastewater Service**

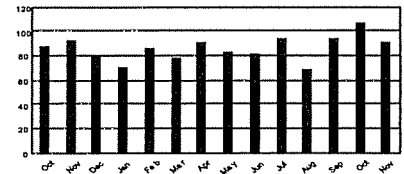
Kentucky State Tax at 6%	\$2.56	
Total City of Clinton Commercial Wastewater Service		\$45.16

**Total Amount Due \$90.18**

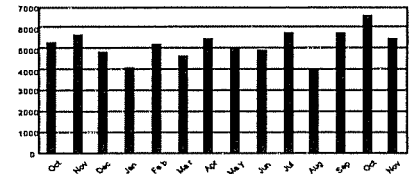
**Summary of Service**

Meter Reading	Meter #	7317
Current	389	10/21/2011
Previous	334	09/23/2011
Usage	55 Units	
Number of Days:	28	
Average Daily Use:	196 Gallons	
Average Daily Cost:	\$3.22	

**Billing History**  
in dollars



**Consumption History**  
in gallons



The payment for this bill is due upon receipt.  
 Make check payable to: Water Service Corp of Kentucky

**Messages**

067



PO BOX 160609  
 Altamonte Springs, FL 32716



Account Number: 1111610000

Due Date: 11/28/2011

Please Pay: \$90.18

Amount Paid

KOUNTRY CAFE  
 105 N WASHINGTON  
 CLINTON KY 42031

Water Service Corp of Kentucky  
 PO Box 11025  
 Lewiston ME 04243-9476



Address correction requested on back

ATTACHMENT 3

## Elise Christian

---

**From:** Smith, Virginia L (PSC) [vlsmith@ky.gov]  
**Sent:** Monday, July 11, 2011 1:19 PM  
**To:** Elise Christian  
**Subject:** RE: 2011\_2144.pdf Ms. Mary Potter

Thank you.

Sincerely,  
Virginia (Ginny) Smith  
Director Consumer Services  
Kentucky Public Service Commission

**From:** Elise Christian [mailto:[ESChristian@ujwater.com](mailto:ESChristian@ujwater.com)]  
**Sent:** Monday, July 11, 2011 1:16 PM  
**To:** Smith, Virginia L (PSC)  
**Subject:** RE: 2011\_2144.pdf Ms. Mary Potter

Dear Ms. Smith:

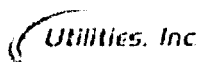
This correspondence is sent in reference to Ms. Mary Potter's complaint concerning billing questions for Kountry Café and for her service at 113 N Washington, Clinton, KY.

May 25, 2011, the Regional Director, Regional Manager and the Area manager spoke to Ms. Peggy Howell about the bills that she had questions about for Kountry Café. It was explained to Ms. Howell that Water Service Corporation of Kentucky had recently converted the entire town's water meters to an AMR meter type and that the April 6, 2011, bill showed two separate meter usage information. Unfortunately, the line item on the bill relating to the "Average Daily Usage" only used the number of days of service that the new AMR meter had been installed to calculate the daily average from the entire month's usage to determine the "Average Daily Usage" that appeared on the bill. The total number of days in service for both meters was not used. It was explained to Ms. Howell that the invoice amount and the total usage billed were correct. Ms. Howell acknowledged that she understood.

June 22, 2011, at the Customer Meeting in Clinton, the Regional Director spoke about the incident regarding the issue with the "Daily Average Usage" that appeared on the April 6, 2011 bill. The reason for the "Daily Average Usage" error was explained by him to the attendees. It was explained that the actual usage and invoice amount for the bill were correct and that the error on the bill only related to the stated "Daily Average Usage". Ms. Potter and Ms. Howell were at this meeting.

July 7, 2011, Ms. Potter was contacted by our office to inquire about her concerns as stated in her complaint. Ms. Potter stated that the concerns had been addressed and that she did not require any additional assistance concerning the complaint.

Please contact our office if additional information is required.



Respectfully,

Elise S Christian  
Customer Relation Specialist  
Phone: 1-800-272-1919



COMPLETED

7-11-11

PSC Consumer Inquiry System

6/30/2011

**Complaint:** 2011-02144    **Entry Date:** 6/30/2011    **Closed Date:**    **Contact Type:** Hotline

**Name:** Kountry Cafe/ Mary Potter    **Utility:** Water Service Corporation of Kentucky

**Address:** 105 N. Washington    **Utility Nbr:** 6000800    **Location:** Residence  
Clinton, KY 42031

**County:** Hickman    **Utility Type:** Investor-Owned

**Home:**    **Work:** (270) 653-3312    **Reason:** Billing ( Billing calculation error )  
(none) ( none )

**Fax:**    **CBR Nbr:**    **Complaint referred by:**

**Cell:**    **Email:**

**Contacted Utility?**     **Spoke with:** Customer Service

**Cust Relations:** None

**Utility Contact:** Mike Pickard (Clinton)    **Contact's:** (270) 653-3621

**Preliminary Description:**    **Other Contacts:**

Due dates

**Processor:** VIRGINIAL.SMITH

**See File**     **Case Related**     **Staff Referral**     **Confidential**

**Info Only**     **Formal Forms**     **Ref to Util**     **Customer Satisfied** Yes  No

**PSC Narratives:**

**Investigator:** VIRGINIAL.SMITH

**Date:** 6/30/2011 3:57:24 PM

After a town meeting in Clinton, Ms. Potter provided a copy of a letter that was sent to the Commission on May 9, 2011. Letter was placed in the case file. The letter from Ms. Mary Potter, Attorney at Law expressed concern about "the last two months of water bills received by Ms. Potter's office and by Kountry Cafe, the business next door to the law firm. The most recent bill was received May 9, 2011.

Please note several items:

First, both Kountry Cafe and the law office have a balance due from the previous billing. Note that the balance due date is May 1, 2011. That happens to be Sunday.

Second, please note that the prior month's bill was due Monday, May 2, 2011. Kountry Cafe paid their bill at City Hall in Clinton on Friday April 29th. The bill from this office was mailed on April 29th.

Third on Kountry Cafe's bill due on May 2nd, the meter reading states that the business used 688 gallons of water PER DAY for eight days. Kountry Cafe has two restrooms and a kitchen. If they were using 688 gallons of water a day for a total usage of 5504 gallons, water would be flowing into the street.

On this office's bill for the same period, this office is listed as using 44 gallons of water per day for nine days. That's a total usage of 395 gallons of water. This office has only one bathroom with one sink and one commode. This office is closed on Saturdays and Sundays.

Fourth, note the due date for the May billing is May 26, 2011. That is one full week before the usual billing date of June 2nd. It will put water users having water bills due twice in the same month.

It is my understanding that Utilities, Inc. aka Water Service Corp. of Kentucky bases its latest rate increase request on the necessity of sharing the cost of the billing and management system with customers.

It is my contention that the billing system is defective. The Company knows or should know it is defective. Customers in Clinton and Middlesboro should not have to bear the expense of a defective product. If they did not know, then the management system is also defective."

Please advise if the utility addressed the above problems with Ms. Potter and the Kountry Cafe and if so what are the findings of the above concerns.

Thanks