

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PRO MAN PROPERTY MANAGEMENT, LLC)
REQUEST FOR DEVIATION FROM 807 KAR)
5:071, SECTION 7(4)) CASE NO. 2013-00286

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO PRO MAN PROPERTY MANAGEMENT, LLC

Pro Man Property Management, LLC ("Pro Man Property"), pursuant to 807 KAR 5:001, shall file with the Commission no later than February 14, 2014, the original and ten copies of the following information, with a copy to all parties of record. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Pro Man Property shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Pro Man Property fails or refuses to furnish all or part of the requested

information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Pro Man Property owns two sewage treatment facilities in Campbell County, Kentucky. State whether Pro Man Property is seeking the requested deviation for its South Hill Subdivision Sewer Plant only.

2. Provide all documents, including correspondence and electronic mail messages, in which Lucas Sanitation provides a description of the services that it provides as certified operator of the South Hill Subdivision Sewer Plant.

3. Provide a description of the services that Lucas Sanitation provides as certified operator of the South Hill Subdivision Sewer Plant.

4. Provide a copy of all invoices and receipts for payment that Lucas Sanitation provided to Pro Man Property for services performed in 2013.

5. Refer to Pro Man Property's response to Commission Staff's First Request for Information, Item 7. Provide a dollar amount for each of the components listed in the response.

6. State how often Lucas Sanitation currently inspects the South Hill Subdivision Sewer Plant.

7. State whether the arrangement between Lucas Sanitation and Pro Man Property requires Lucas Sanitation to inspect after unusual events (e.g., heavy rain

event, extended dry periods, turbulent weather events). If the arrangement requires such inspection, describe the event(s) or circumstance(s) that triggers the requirement to inspect.

8. Explain why a person who is not a certified operator cannot perform some of the daily inspections to eliminate the need for additional inspections by the certified operator.

9. State whether Pro Man Property takes the position that a certified operator must perform all inspections. If Pro Man Property takes this position, explain the basis for this position.

10. State whether Pro Man Property has approached Lucas Sanitation about performing inspections of the South Hill Subdivision Sewer Plant on a more frequent basis.

11. State whether Pro Man Property has considered the installation of an alarm system at the South Hill Subdivision Sewer Plant in lieu of the performance of inspections on a daily basis. If Pro Man Property has considered such option, state the decision that it reached regarding such option and its basis for such decision.

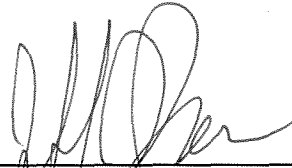
12. Assume that an equipment problem occurs at the South Hill Subdivision Sewer Plant that prevents the mechanical blowers from functioning. State the number of days it would take for the plant to become septic after the blowers failed.

13. a. State whether Pro Man Property has a backup blower onsite at the South Hill Subdivision Sewer Plant or readily available for installation in the event of a malfunctioning blower.

b. If a backup blower is available, state how long it would require to place the backup blower into service.

c. If a backup blower is not available, state how much time Pro Man Property estimates would be needed to acquire such blower and place it into operation at the plant.

14. Describe the status of Pro Man Property's efforts to tie its sewage system into Sanitation District No. 1 of Northern Kentucky.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED JAN 30 2014

cc: Parties of Record

Case No. 2013-00286

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