

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2013-00383

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FEB 28 2014

PUBLIC SERVICE
COMMISSION

In the Matter of:

OZARK AND KIM SLONE

COMPLAINANTS

VS.

SOUTHERN WATER & SEWER DISTRICT

DEFENDANT

**SOUTHERN WATER & SEWER DISTRICT'S RESPONSE TO COMMISSION
STAFF'S FIRST REQUEST FOR INFORMATION**

Comes the Defendant, by counsel, and hereby responds to the Commission Staff's First Request for Information as follows:

- 1) The residence in question should be referred to as 36 Tackett Branch, Bevinsville, Kentucky.
- 2) The water meter at 36 Tackett Branch was disconnected and removed in June 2010 for delinquent payment.
- 3) Michael Slone was being provided service at 36 Tackett Branch when the water meter was removed from the premises.
- 4) There is no record of service rendered for either Chester Wells or Eileen Moore at 36 Tackett Branch.
- 5) The following expand upon the Response dated January 24, 2014
 - a. Southern Water & Sewer District learned about the straight pipes at 36 Tackett Branch when other customers in the area had low pressure or no water.

- b. Numerous straight pipes were identified and removed from 36 Tackett Branch. Southern Water & Sewer District does not currently maintain records for when straight pipes are removed.
 - c. In each instance in which a straight pipe was discovered and removed, Southern Water & Sewer District did not have an active customer at 36 Tackett Branch.
 - d. Ozark Slone and Kim Slone were not notified upon the discovery and removal of the straight pipes. At the time of the straight pipes being discovered, Southern Water & Sewer District did not have any record of ownership of the property at 36 Tackett Branch. However, service personnel attempted, unsuccessfully, to make contact with the occupants of the residence.
 - e. Southern Water & Sewer District does not have any photographs of the straight pipes in its possession.
 - f. No work orders or supporting documentation exist concerning removal of each straight pipe. It is the policy of Southern Water & Sewer District to remove any straight pipes, bars, or devices, when found, without work order or further authorization. As such, no written records exist.
- 6) Ozark Slone and Kim Slone were not notified prior to the water meter's removal at 36 Tackett Branch due to the fact that Southern Water & Sewer District did not have any record of ownership of the property. As stated in Response 5(d) herein, service personnel did, however, unsuccessfully attempt to make contact with the occupants of the residence.

- 7) No documents were sent to Ozark Slone and Kim Slone, as Southern Water & Sewer District did not have any record of ownership of the property.
- 8) All documents sent to 36 Tackett Branch, Bevinsville, Kentucky, between January 1, 2010, and October 18, 2013 were addressed to Michael Slone in the form of regular bills and disconnect notices. Southern Water & Sewer District does not have these items in its possession. Southern Water & Sewer District electronically retains only the information (e.g., bill amounts, disconnect dates, etc.) contained in these notices.
- 9) Prior to removing a water meter, Southern Water & Sewer attempts to notify a property owner by person, phone, or mail if property ownership is known.

Respectfully submitted,

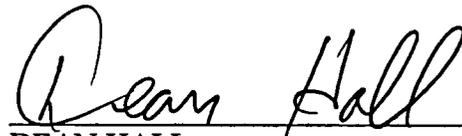


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Counsel—Southern Water & Sewer District

CERTIFICATION

I, Dean Hall, do hereby certify that this response is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



DEAN HALL
MANAGER