

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT PETITION OF W & W SERVICE)	
CORPORATION AND PADUCAH-)	
MCCRACKEN COUNTY JOINT SEWER)	
AGENCY TO APPROVE THE TRANSFER)	CASE NO. 2014-00013
OF OPERATION OF THE TERRE VERTE)	
SUBDIVISION TO PADUCAH-MCCRACKEN)	
COUNTY JOINT SEWER AGENCY)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO W & W SERVICE CORPORATION AND
PADUCAH-MCCRACKEN COUNTY JOINT SEWER AGENCY

W & W Service Corporation ("W&W") and Paducah-McCracken County Joint Sewer Agency ("JSA") (collectively "Joint Applicants") are requested, pursuant to 807 KAR 5:001, to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 15 days from the date of this Request for Information. 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.

Joint Applicants shall make timely amendment to any prior response if they obtain 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 Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for the failure to completely and precisely respond.

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

1. List and describe the nature of all legal actions in which JSA is a party and which involve the operations of its sewer operations.
2. List and provide a copy of each notice of violation (“NOV”) that JSA has received regarding the operation of its sewer facilities from the Kentucky Division of Water since January 1, 2008. State the current status of each NOV.
3. List and provide a copy of each NOV that W&W has received regarding the operation of its sewer facilities from the Kentucky Division of Water since January 1, 2008. State the current status of each NOV.
4. Provide all correspondence between JSA and the Kentucky Division of Water regarding JSA's acquisition of W&W's facilities.
5. State the distance from JSA's nearest sewer collection mains to W&W's sewer collection mains in the Terre Verte subdivision.

6. Describe JSA's current plans to connect its sewer collection mains to W&W's sewer collection system in the Terre Verte subdivision. Include in this description all estimates of the cost to extend JSA's facilities to the Terre Verte subdivision.

7. Provide a copy of JSA's current rate schedule for sewer service.

8. State the rates that JSA intends to charge persons currently served by W&W upon completion of the transfer.

9. If W&W is holding customer deposits, describe the actions that will be taken regarding these deposits upon the transfer of W&W's sewer facilities.

10. Provide a copy of JSA's current regional facility plan. In lieu of submitting an original and eight copies in paper medium, an electronic version in portable document format on electronic storage medium may be submitted.

11. Provide a copy of all appraisals of the assets to be transferred that have been performed since January 1, 2008.

12. List and describe all material changes to JSA's financial condition since June 30, 2013.

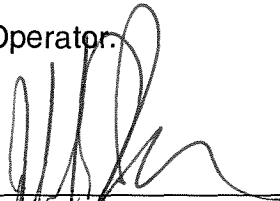
13. Is the description of JSA's wastewater collection and treatment assets as found in *Kentucky Wastewater Management Plan*¹ accurate?

14. State the value at which the McCracken County Property Valuation Administrator currently assesses the property that will be transferred to JSA.

¹ The most current version of this plan is available at http://kia.ky.gov/NR/rdonlyres/9A094655-E931-4A98-8F07-914CE0A50D2E/0/CW_ManagementPlan_State_062513.pdf.

15. List the name and class of each JSA employee whom the Kentucky Energy and Environment Cabinet has certified as:

- a. Wastewater Treatment Plant Operator;
- b. Wastewater Collection System Operator.



Jeff Derouen
Executive Director
Public Service Commission
P. O. Box 615
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DATED JAN 24 2014

cc: Parties of Record

Case No. 2014-00013

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