

STEWART HOME SCHOOL

ESTABLISHED 1893

J. BARRY BANKER
CEO/MANAGER

September 30, 2015

RECEIVED

OCT 9 2015

PUBLIC SERVICE
COMMISSION

Mr. Jeff DeRouen,
Executive Director
PSC
P.O. Box 615
Frankfort, KY 40602

Case No. 2015-00357

Mr. DeRouen:

Enclosed are four (4) copies of our complaint against Farmdale Water District. Stewart Home & School was established in 1893, has paid millions of dollars in taxes since then, provides employment for more than 135 people and provides year round care for over 350 students from 38 states and 5 foreign countries.

We have always had a good relationship with Farmdale and even provided the land for them to put their new water tower on. Over a year ago, a rate increase was passed which we were never made aware of until we received our bill showing an increase of over 60% for the same amount of water!! There is discussion about a 4" meter/pipe tariff. I don't understand the specifics. I just know our water bill has drastically increased without any input from us.

I thank you for looking into our complaint. I was told by a Commissioner of Farmdale that they couldn't "do anything" until we filed a complaint in terms of discussing the matter.

Sincerely,



J. Barry Banker

Enclosures

JBB:mp

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION
PUBLIC SERVICE
COMMISSION

In the matter of:

Stewart Home School, LLC
(Your Full Name)

COMPLAINANT

VS.

Farmdale Water District
(Name of Utility)

DEFENDANT

RECEIVED

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PUBLIC SERVICE
COMMISSION

COMPLAINT

The complaint of Stewart Home School, LLC
(Your Full Name) respectfully shows:

(a) J. BARRY BANKER
(Your Full Name)

4200 LAWRENCEBURG Rd FRANK
(Your Address)

JBANKER@STEWARTHOMESCHOOL.COM
(Your Email Address)

(b) Farmdale Water District
(Name of Utility)

100 Highwood Drive FRANKFORT
(Address of Utility)

(c) That: RATE INCREASE WAS implemented over a
(Describe here, attaching additional sheets if necessary,

year ago that increased our rate over 60% - we had no
the specific act, fully and clearly, or facts that are the reason

notice and have been told it has something to do with
and basis for the complaint.)

a 4" meter and something about a new tariff.

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Formal Complaint

Stewart Home School vs. Farmdale Water District

Page 2 of 2

Our bill has increased thousands of dollars a month. The Board of Farmdale has not been cooperative with me. They finally said they can only discuss if we file a complaint. We have been in business 122 years. We cannot pass 60% cost increases to our parents.

Wherefore, complainant asks that a meeting be held to
(Specifically state the relief desired.)

discuss why the exorbitant rate increase
was allowed to be passed with no input
from the largest water consumer in the
Farmdale District.

Dated at Frankfort, Kentucky, this 29th day
(Your City)

of September, 20 15.
(Month)

J. Ray Bender
(Your Signature*)

9-29-15

Date

Brian A. Logan
(Name and address of attorney, if any)

Brian A. Logan
114 West Clinton St.
Frankfort, KY 40601

(502) 875-3884 *Complaints by corporations or associations, or any other organization having the right to file a complaint, must be signed by its attorney and show his post office address. No oral or unsigned complaints will be entertained or acted upon by the commission.

- (1) **Contents of complaint.** Each complaint shall be headed "Before the Public Service Commission," shall establish the names of the complainant and the name of the defendant, and shall state:
 - (a) The full name and post office address of the complainant;
 - (b) The full name and post office address of the defendant; and
 - (c) Fully, clearly, and with reasonable certainty, the act or thing done or omitted to be done, of which complaint is made, with a reference, if practicable, to the law, order, or administrative regulation section and subsection, of which a violation is claimed, and other matters, or facts, if any, as necessary to acquaint the commission fully with the details of the alleged violation. The complainant shall specifically establish the relief desired.
- (2) **Signature.** The complaint shall be signed by the complainant or his or her attorney, if applicable, and if signed by an attorney, shall show the attorney's post office address. **A complaint by a corporation, association, or another organization with the right to file a complaint, shall be signed by the entity's attorney.**
- (3) **Number of copies required.** When the complainant files his or her original complaint, the complainant shall also file two (2) more copies than the number of persons or corporations to be served.
- (4) **Procedure on filing of complaint.**
 - (a) Upon the filing of a complaint, the commission shall immediately examine the same to ascertain if it establishes a prima facie case and conforms to this administrative regulation.
 1. If the commission is of the opinion that the complaint does not establish a prima facie case or does not conform to this administrative regulation, the commission shall notify the complainant or his or her attorney to that effect, and opportunity shall be given to amend the complaint within a specified time.
 2. If the complaint is not amended within the time or the extension as the commission, for good cause shown, shall grant, the complaint shall be dismissed.
 - (b) If the complaint, either as originally filed or as amended, establishes a prima facie case and conforms to this administrative regulation, the commission shall serve an order upon the person complained of, accompanied by a copy of the complaint, directed to the person complained of and requiring that the matter complained of be satisfied, or that the complaint be answered in writing within ten (10) days from the date of service of the order, provided that the commission may, in particular cases, require the answer to be filed within a shorter or longer period.
- (5) **Satisfaction of the complaint.** If the defendant desires to satisfy the complaint, he or she shall submit to the commission, within the time allowed for satisfaction or answer, a statement of the relief which the defendant is willing to give. Upon the acceptance of this offer by the complainant and with the approval of the commission, further proceedings shall not be taken.
- (6) **Answer to complaint.** If the complainant is not satisfied with the relief offered, the person complained of shall file an answer to the complaint, with certificate of service on other endorsed parties, within the time specified in the order or the extension as the commission, for good cause shown, shall grant.
 - (a) The answer shall contain a specific denial of the material allegations of the complaint as controverted by the defendant and also a statement of new matter constituting a defense.
 - (b) If the answering party does not have information sufficient to enable him or her to answer an allegation of the complaint, the answering party may so state in the answer and place the denial upon that ground.