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SEP 28 2017

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September 20, 2017

Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
PO Box 615  
Frankfort, KY 40601

RE: Oldham Woods Sanitation, Inc.  
Request for Deviation

Dear Sir:

On behalf of Patience Martin, President of Oldham Woods Sanitation, Inc., we hereby request a deviation from ~~request a deviation from~~ KAR 5:006 and 5:011 which require utilities to provide an open office space for consumers 7 hours per week.

Ms. Martin currently runs the business of Oldham Woods Sanitation from a home office. If she is required to rent office space and hire an employee for a total of seven hours a week, it would be an undue economic hardship on her which would need to be passed on to the customers of Oldham Woods Sanitation.

In the alternative, as is specified in greater detail in the letter attached hereto from Ms. Martin, she is requesting a deviation from the regulations to allow a website (available at any time and on any day) which contains the same information that would be available in an office environment. In this time, a website serves as a virtual office, providing access to all information and contact information for Ms. Martin, the plant operator and connection to the Oldham County Water District. For most customers, access to this information would be as close as their cell phones or laptops, and for the few who are less technologically savvy, it would be only as far as the LaGrange Library, which offers free computer access to LaGrange citizens.

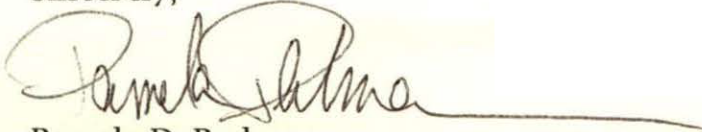
The website is already active: [www.oldhamwoodssanitation.com](http://www.oldhamwoodssanitation.com) and is easily navigable.

On the occasions when a personal meeting is requested, Ms. Martin is available to do so by appointment.

For these reasons and those specified in her letter, we request a deviation allowing the website to assume the function of a physical office space.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Pamela D. Perlman', with a long horizontal flourish extending to the right.

Pamela D. Perlman

Encl.

August 15, 2017

Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
PO Box 615  
Frankfort, KY 40601

Dear Commissioners,

I'm writing this letter in response to the recent inspection report filed by Brian Rice. He noted 2 areas of concern (structural issues), and 14 deficiencies which are all related to the lack of office space.

First, I would like to address the areas of concern: the lagoon piers. The plant operator, Larry Smither, is monitoring the condition of the piers, and reporting to me regarding their safety. I fully intend to make the necessary repairs or new construction in the near future, and I trust the piers will be a non-issue before the next inspection.

Next I would like to address the deficiencies regarding regulations that specify the use of an office. I propose to fulfill the plant's responsibility to the customers without creating undue hardship for the plant's president or its customers.

It is my belief that these regulations were created to give utility customers access to information about their utility companies. While most customers may have no interest in accessing this information, it should be available to those who do want that information. Making this information available to customers for only a limited number of hours per week, possibly hours that are inconvenient to them, and, in the case of a home office situation, at a location that is inconvenient to them, would be a disservice. It would fulfill the letter, but not the spirit, of these regulations. I propose to fulfill the spirit - to make all required information available to the customers not just 7 hours per week, but 7 days per week, 365 days a year, in a cost-effective way – and, with your permission, to deviate only from the letter of this regulation. I propose, and have already secured, a web site for Oldham Woods Sanitation customers. This site is an efficient, cost-effective, and convenient alternative to a physical office, and provides everything a customer would need. It will serve as a virtual office, and will address all of the customers' needs without limiting the hours of access. It will provide access to the tariff, as well as the means to contact me or the plant's operator, and to connect to Oldham County Water District, which provides online bill pay for the OWS customers. For most customers, access to this information would be as close as their cell phones or laptops, and for the few who are less technologically savvy, it would be only as far as the LaGrange Library, which offers free computer access to LaGrange citizens.

I request a deviation from KAR 5:006 and 5:011 on the following grounds: If office space is to be rented for 7 hours per week, and a representative (either I or someone else) is to be paid for working those 7 hours per week, it would put an undue hardship on the customers, as the funds to cover office rental and worker compensation would have to be passed onto them. Oldham Woods Sanitation would have to request another rate increase, and overall customer bills would increase.

I'm speaking not just on behalf of Oldham Woods Sanitation, but on behalf of all small utilities. Requiring us all to have a separate office is putting an undue hardship on the customers as well as the owners and presidents. It will divert time and resources that could be better spent on improving and maintaining the plants.

I think it's important to add that even before I decided to establish an Oldham Woods Sanitation web site, I had been maintaining a home office, which I organized when I took over as president. Prior to that, my other family members had also maintained home offices. That alone should address some of the deficiencies noted in the recent report. My home is where I keep records and pay the bills, but I consider this a private office, rather than a public one. I'm often working on bookkeeping tasks or correspondence between the hours of 11pm and 2 or 3am. These are the hours I am free to work, but they are by no means regular hours. I am, however, available and willing to meet with customers, PSC representatives, or other interested parties during more typical business hours, by appointment – given reasonable notice. For instance, in May of 2016, I put my OWS file folders in a bag, and met with two PSC representatives at a local coffee shop. On other occasions, I have met with people at similar locations, or at the plant site. If I were the customer, I would much prefer making an appointment that suits my schedule over having to stop in during the 7 hours per week that the utility is open. While I understand it may be unusual not to have a public office, larger utilities such as LG&E or the Oldham County Water District maintain offices because they have so many employees (while OWS has none) and they have enough customer and industry foot traffic to necessitate office space.

Turning my home into a public office would present a hardship and inconvenience for OWS customers, as they all live in another county, approximately 20 miles from my current residence. It would be a greater hardship for me, and even a potential hazard. I am a single female, currently living alone on a quiet street which sees little traffic. It's all well to say I have a home office open only 7 hours per week, but once people have my home address, they have it at all hours of the day and night, and that would cause me much concern. I am a customer of LG&E, KU, and Louisville Water. I have access to pay my bills, inquire about service, and examine my rates, but I don't have those company officers' home addresses, nor do I want or need them. Forcing me to provide my home address to the public would compromise my personal safety. Forcing me to rent and staff office space would raise my customers' rates unnecessarily.

In this letter, the deficiencies have been addressed in a general way, but here I'm also addressing them more specifically:

1, 8, 10, 14: These issues have already been addressed by OWS previously maintaining a home office and a PO box.

7: Camden Environmental Service Company has the maps in question. These maps will also, upon acceptance of the deviation request, be scanned and added to the OWS web site.

4: The Oldham County Water District has for some years been subcontracted to receive payments from OWS customers, as well as to negotiate partial payments, and that entity has maintained an office all this time.



2, 3, 5, 6, 9, 11, 12, 13: These issues will, upon acceptance of the deviation request, be addressed by maintaining a web site.

On March 25, 2016, Oldham Woods Sanitation, Inc requested a deviation from KAR 5:076. A copy of that request is enclosed. Also enclosed is a copy of the PSC response, granting that request.

I believe that when the PSC granted that request, a precedent was set for granting this current deviation request. It is not my intention for Oldham Woods Sanitation to shirk its responsibilities to its customers, but rather to consider their needs and my own, as well as my fiduciary responsibility, and provide a 21<sup>st</sup> century means to meet all of our needs.

Respectfully submitted,

Patience Martin, President  
Oldham Woods Sanitation, Inc  
PO Box 23226  
Anchorage, KY 40223