RECEIVED



# RALEIGH P. SHEPHERD

#### Attorney at Law 305 Main Street Manchester, Kentucky 40962

Telephone: (606) 599-0311

SEP 11 2020

PUBLIC SERVICE COMMISSION

Fax: (606) 599-0344

September 11, 2020

Kentucky Public Service Commission (PSC) Post Office Box 615 211 Sower Boulevard Frankfort, KY 40602-0615 via e-mail <u>psced@ky.gov</u>

### Re: Filing of Response of North Manchester Water Association (NMWA) to Commission Staff's Second Request for Information to NMWA Case No. 2019-00457

To Whom It May Concern:

Attached please find the Response of NMWA to Commission Staff's Second Request for Information to NMWA.

Sincerely,

Raleigh P. Shepherd

Raleigh P. Shepherd, Esq.

RPS/es

#### COMMONWEALTH OF KENTUCKY

#### BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BRANDON AND TABITHA SWAFFORD	)
COMPLAINANT	) CASE NO. ) 2019-00457
V.	) )
NORTH MANCHESTER WATER ASSOCIATION, INC.	)
DEFENDANT	)

# **RESPONSE OF NORTH MANCHESTER WATER ASSOCIATION (NMWA) TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO NMWA**

Comes NMWA, by and through its legal counsel, and for its response states as follows:

1. Provide a copy of bills for all customer accounts for Brandon and Tabitha Swafford for water

service at 2885 Upper Rader Road, Manchester, Kentucky from October 1, 2019, to the most current

bill.

Answer: There are two (2) separate accounts for Brandon Swafford: Account Number 05070,

attached hereto as Exhibit A; and Account Number 165610, attached hereto as Exhibit B.

ALL on this 11th day of SEPTEMBER, 2020.

Respectfully Submitted,

RALEIGH P. SHEPHERD ATTORNEY AT LAW 305 MAIN STREET MANCHESTER, KENTUCKY 40962 TELEPHONE: (606) 599-0311 FACSIMILE: (606) 599-0344 E-MAIL: <u>shepherdlawoffice@icloud.com</u> ATTORNEY FOR NMWA

#### VERIFICATION

Steve Davis, President and Board Chairman of North Manchester Water

Association, being duly sworn upon his oath deposes and states:

I have read the foregoing response and requests for production of documents served upon me by the Kentucky Public Service Commission; and the foregoing response to same is a true and accurate according to the best of my knowledge, information and belief.

COMMONWEALTH OF KENTUCKY,

COUNTY OF CLAY,

SUBSCRIBED, sworn to and acknowledged before me by STEVE DAVIS, President and Board Chairman of North Manchester Water Association on this 10th day of September, 2020.

My Commission Expires: 09/13/2021.

ARY PULIC, STATE AT LARGE ID#584571

#### CERTIFICATE OF SERVICE

I hereby certify and attest that on this 11th day of SEPTEMBER, 2020, a true and accurate copy of the foregoing response was served via electronic mail to the Kentucky Public Service Commission, at psced@ky.gov and first class mail to:

Brandon and Tabitha Swafford 2885 Upper Rader Road Manchester, KY 40962

Steve Davis, President of NMWA 7362 North Highway 421 Manchester, KY 40962

RALEIGH P. SHEPHERD, ESO.

# NORTH MANCHESTER WATER ASSN.

# 7361 NORTH HWY 421

# MANCHESTER KY 40962

# Customer Record Printed at 12:41:19 on 09/09/2020

### Account Number: 05070

			ACCC	ount Numbe	r: 05070				
Name: S	WAFFOR	D, BRAN	DON			Water-Y/N/\$:	Y		
Address:					:	Sewer-Y/N/\$:	N		
Address:						Garbage-Y/N			
City/St: M	ANCHES	TER KY	D.L.#: -			Vol-Fire-Y/N/			
Zip: 409			Tel. #1/2: 606	65960830		Service Tax-			
						Route: 04		1-5/8 X 3/4	
METER IN	FORMAT	ION			-	Cycle: A	Group: (		
Meter #:			Type:			Multiplier: 00			
Location:			.)poi			Special:			
Last Servi	ice: 1/1/19	000	Code:				nce: 002140		
Install Dat			0000.			Walk Sequence: 002140 Other Charge/Credit 1: 0.00			
Read Date			Usage: 350	Days: 3		Other Charge			
Previous:		20	Current: 342			Misc-4:	eroreunt 2.	0.00	
Lot Num:	541710		Owners Nam			Misc-5:			
S.S. #:			Owners Hall			Meter Size/B	rand: 5/9" /	1	
	ddroee. 2		R RADER RD				a service service in the service of the	sidential/Sing	alo Eami
Email Add						Sustomer Ty	pe. RI-Res	sidential/Sing	Jie Faili
	Charg	es Due	Last Bill	Past Due	•	Accoun	t Aging		
	3		09/02/2020						
Water		21.60	21.60	0.00		Current	22.2	5	
Sewer		0.00	0.00	0.00		1-Month	0.0		
Garbage		0.00	0.00	0.00		2-Months	0.0		
Vol-Fire		0.00	0.00	0.00		3-Months	0.0		
Service Ta	x	0.00	0.00	0.00		4+Months	0.0		
Other 1		0.00	0.00	0.00					
Other 2		0.00	0.00	0.00		Fotal	22.2	5	
Taxes		0.65	0.65	0.00					
Late-fee1		0.00	0.00	0.00		Deposit Date	: 01/01/190	0	
Late-fee2		0.00		<prev balan<="" td=""><td></td><td>Deposit Amt:</td><td></td><td></td><td></td></prev>		Deposit Amt:			
Totals		22.25	22.25	0.00		Septem Ante	00.00		
	ge Histor			g History		Payment			
Read Date	Usage	# Days	Bill Date	Amount	Pay Date	Amount	Balance	Paid By	
08/14/2020	350	31	09/02/2020	22.25	08/10/2020	22.25	0.00	Check	
07/14/2020	590	28	07/29/2020	22.25	07/08/2020	22.25	0.00	Check	
06/16/2020	200	33	06/29/2020	22.25	06/11/2020	22.25	0.00	Check	
05/14/2020	260	27	06/01/2020	22.25	05/04/2020	22.25	0.00	Check	
04/17/2020	110	31	04/24/2020	22.25	04/09/2020	) 22.25	0.00	Check	
03/17/2020	220	31	04/01/2020	22.25	03/06/2020	22.25	0.00	Check	
02/15/2020	140	32	02/25/2020	22.25	02/10/2020	22.25	0.00	Check	
01/14/2020	460	29	01/28/2020	22.25	01/15/2020	22.25	0.00	Check	
12/16/2019	390	32	12/31/2019	22.25	12/11/2019	24.48	0.00	Check	
11/14/2019	590	31	11/26/2019	22.25	11/12/2019	22.25	2.23	Check	
10/14/2019	490	27	10/28/2019		10/09/2019		0.00	Check	
09/17/2019	610	29	09/24/2019		09/10/2019	22.25	0.00	Check	
08/19/2019	860	34	08/26/2019	143.08	08/08/2019	22.25	0.00	Check	
Comments:			1						
							FY	HIBIT	
							In A		

A

Notes	<del>O</del> S	Account	Change	E	Email 🔡	Service Order	Mis Charg	- Example	Rates
Company	_			Prem	nise ID				
01 - NORTH M	MANCH	HESTER WATER AS	SSN. $\sim$						1
Account Num	ber	Custome	Name						
05070		SWAFFOR	D, BRAN	DON					
							1		
Customer P	rofile	Charge	s Due		Payme	ents	М	eter/Util	ity
	or this	6/19/201     Account     Payments     Latefees     Other Charges	O Adju O Serv	ustments vice Orde	rs Account Ch	anges	Disp	laying Cus	tomer
Post D	Cd	Effective Date	Water	Sewer	Garbage	Vol-Fire	Service Tax	Other1	Othe
9/2/2020	В	9/2/2020	21.60	0.00	0.00	0.00	0.00	0.00	0
7/29/2020	В	7/29/2020	21.60	Ser Jaren an		the Annual States			
6/29/2020	в	6/29/2020	21.60		and a second				
6/1/2020	В	6/1/2020	21.60		Andrea Breit				-
4/24/2020	в	4/24/2020	21.60						
4/1/2020	В	4/1/2020	21.60						
2/25/2020	В	2/25/2020	21.60				See State		1.1
1/28/2020	В	1/28/2020	21.60						
12/31/2019	В	12/31/2019	21.60					2	
11/26/2019	В	11/26/2019	21.60						
10/28/2019	В	10/28/2019	21.60						
9/24/2019	В	9/24/2019	21.60	124.0					
8/26/2019	в	8/26/2019	138.91						
7/26/2019	В	7/26/2019	21.60						
6/28/2019	в	6/28/2019	31.55						
5/23/2019	B	5/23/2019	30.00	11-2-11-11-11-11-11-11-11-11-11-11-11-11				and the second	

# NORTH MANCHESTER WATER ASSN.

# 7361 NORTH HWY 421

### MANCHESTER KY 40962

# Customer Record Printed at 12:41:53 on 09/09/2020

#### Account Number: 165610

FFORD, BRAN 5 UPPER RADI	IDON #2					
			1	Water-Y/N/\$:	Yes	
				Sewer-Y/N/\$:	No	
				Garbage-Y/N	/\$: No	
CHESTER, KY	D.L.#: KY-			Vol-Fire-Y/N/		
	Tel. #1/2: 606-8	13-5743		Service Tax-		
	101. // 1/2. 000 0	10 01 10				1.5/8 X 3/A
PMATION					2.02020200	
	Type				Group. (	
3220	Type.					
4/4/4000	Cada					
	Code:					
	11	D				
					Credit 2:	0.00
10						
	Owners Name:					
	ER RADER RD			Customer Ty	pe: R1-Res	idential/Single Fam
Charges Due	Last Bill	Past Due	1	Accoun	t Aging	
				1-Month		
0.00	0.00	0.00		2-Months	0.0	0
0.00	0.00	0.00	:	3-Months	0.0	0
0.00	0.00	0.00		4+Months	0.0	0
0.00	0.00	0.00		Total	12 8	2
0.00	0.00	0.00		lotai	42.02	
1.25	1.25	0.00	1			
0.00	0.00		1	Deposit Date:	: 06/28/201	9
0.00	0.00 <-	-Prev Baland	ce l	Deposit Amt:	80.00	
42.82	42.82	0.00		•		
	and the second se					
sage # Days	Bill Date	Amount	Pay Date	Amount	Balance	Paid By
5210 31	09/02/2020	42.82	08/10/2020	41.92	0.00	Check
5070 28	07/29/2020	41.92	07/08/2020		0.00	Check
	06/29/2020	40.31				Check
4850 27	06/01/2020	40.51			0.00	Check
3480 31	04/24/2020	31.73	04/09/2020		0.00	Check
4010 31	04/01/2020	35.12	03/06/2020		0.00	Check
	02/25/2020	33.65	02/10/2020		0.00	Check
3780 32			01/15/2020		0.00	
3780 32 3560 29	01/28/2020	32.24	VIIIGIZUZI		0.00	Check
3560 29	01/28/2020	32.24 37.63				Check Check
3560 29 4400 32	12/31/2019	37.63	12/11/2019	9 41.91	0.00	Check
3560         29           4400         32           4530         31	12/31/2019 11/26/2019	37.63 38.46	12/11/2019 11/12/2019	9 41.91 9 34.48	0.00 3.45	Check Check
3560         29           4400         32           4530         31           3910         27	12/31/2019 11/26/2019 10/28/2019	37.63 38.46 34.48	12/11/2019 11/12/2019 10/09/2019	9 41.91 9 34.48 9 22.25	0.00 3.45 0.00	Check Check Check
3560         29           4400         32           4530         31	12/31/2019 11/26/2019	37.63 38.46	12/11/2019 11/12/2019	9       41.91         9       34.48         9       22.25         9       22.25	0.00 3.45	Check Check
	SS: Charges Due 41.57 0.00 0.00 0.00 0.00 0.00 0.00 1.25 0.00 0.00 42.82 History Sage # Days 5210 31 5070 28 4820 33	3228       Type:         1/1/1900       Code:         1/1/1900       /14/2020         /14/2020       Usage: 5210         910       Current: 51120         Owners Name:       Owners Name:         ess:       2885 UPPER RADER RD         charges Due       Last Bill         09/02/2020       41.57         41.57       41.57         0.00       0.00         0.00       0.00         0.00       0.00         0.00       0.00         0.00       0.00         0.00       0.00         0.00       0.00         0.00       0.00         1.25       1.25         0.00       0.00         0.00       0.00         0.00       0.00         0.00       0.00         1.25       1.25         0.00       0.00         42.82       42.82         History       Billing Bill Date         5210       31       09/02/2020         5210       31       09/02/2020         4820       33       06/29/2020	33228       Type:         1/1/1900       Code:         1/1/1900       Usage: 5210       Days: 31         910       Current: 51120       Owners Name:         ess:       2885 UPPER RADER RD         ess:       2885 UPPER RADER RD         charges Due       Last Bill       Past Due         09/02/2020       41.57       41.57       0.00         41.57       41.57       0.00         0.00       0.00       0.00       0.00         0.00       0.00       0.00       0.00         0.00       0.00       0.00       0.00         0.00       0.00       0.00       0.00         0.00       0.00       0.00       0.00         0.00       0.00       0.00       0.00         0.00       0.00       0.00       0.00         1.25       1.25       0.00         0.00       0.00       0.00       0.00         1.25       1.25       0.00         1.25       1.25       0.00         0.00       0.00       42.82       42.82         42.82       42.82       0.00         History       Bill Date       Amount <td>RMATION         D3228         Type:           21/1/1900         Code:           1/1/1900         Code:           1/1/1900         Usage: 5210         Days: 31           210         Current: 51120         Owners Name:           285         UPPER RADER RD         Sis:           Charges Due         Last Bill           200         41.57         41.57         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         <td< td=""><td>33228         Type:         Multiplier: 1 Special:           1/1/1900         Code:         Walk Sequen Other Charge           1/1/1900         Code:         Walk Sequen Other Charge           1/1/1900         Current: 51120         Days: 31           010         Current: 51120         Misc-4:           0wners Name:         Misc-5:           weter Size/Bit         Customer Ty           ss:         Charges Due         Last Bill           09/02/2020         Current         Accoun           09/02/2020         41.57         41.57         0.00           41.57         41.57         0.00         Current           0.00         0.00         0.00         3-Months           0.00         0.00         0.00         4+Months           0.00         0.00         0.00         Total           0.00         0.00         0.00         Deposit Date           0.00         0.00         Current         Amount           42.82         42.82         0.00         Payment           sage # Days         Billing History         Payment           5210         31         09/02/2020         42.82           07/29/2020         41.92</td><td>RMATION         Cycle: A         Group: C           03228         Type:         Multiplier: 1           1/1/1900         Code:         Walk Sequence: 002150           1/1/1900         Code:         Walk Sequence: 002150           1/1/1900         Current: 51120         Days: 31           010         Current: 51120         Misc-4:           0wners Name:         Misc-5:           09/02/2020         Misc-5:           Charges Due         Last Bill         Past Due           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00</td></td<></td>	RMATION         D3228         Type:           21/1/1900         Code:           1/1/1900         Code:           1/1/1900         Usage: 5210         Days: 31           210         Current: 51120         Owners Name:           285         UPPER RADER RD         Sis:           Charges Due         Last Bill           200         41.57         41.57         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           0.00 <td< td=""><td>33228         Type:         Multiplier: 1 Special:           1/1/1900         Code:         Walk Sequen Other Charge           1/1/1900         Code:         Walk Sequen Other Charge           1/1/1900         Current: 51120         Days: 31           010         Current: 51120         Misc-4:           0wners Name:         Misc-5:           weter Size/Bit         Customer Ty           ss:         Charges Due         Last Bill           09/02/2020         Current         Accoun           09/02/2020         41.57         41.57         0.00           41.57         41.57         0.00         Current           0.00         0.00         0.00         3-Months           0.00         0.00         0.00         4+Months           0.00         0.00         0.00         Total           0.00         0.00         0.00         Deposit Date           0.00         0.00         Current         Amount           42.82         42.82         0.00         Payment           sage # Days         Billing History         Payment           5210         31         09/02/2020         42.82           07/29/2020         41.92</td><td>RMATION         Cycle: A         Group: C           03228         Type:         Multiplier: 1           1/1/1900         Code:         Walk Sequence: 002150           1/1/1900         Code:         Walk Sequence: 002150           1/1/1900         Current: 51120         Days: 31           010         Current: 51120         Misc-4:           0wners Name:         Misc-5:           09/02/2020         Misc-5:           Charges Due         Last Bill         Past Due           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00</td></td<>	33228         Type:         Multiplier: 1 Special:           1/1/1900         Code:         Walk Sequen Other Charge           1/1/1900         Code:         Walk Sequen Other Charge           1/1/1900         Current: 51120         Days: 31           010         Current: 51120         Misc-4:           0wners Name:         Misc-5:           weter Size/Bit         Customer Ty           ss:         Charges Due         Last Bill           09/02/2020         Current         Accoun           09/02/2020         41.57         41.57         0.00           41.57         41.57         0.00         Current           0.00         0.00         0.00         3-Months           0.00         0.00         0.00         4+Months           0.00         0.00         0.00         Total           0.00         0.00         0.00         Deposit Date           0.00         0.00         Current         Amount           42.82         42.82         0.00         Payment           sage # Days         Billing History         Payment           5210         31         09/02/2020         42.82           07/29/2020         41.92	RMATION         Cycle: A         Group: C           03228         Type:         Multiplier: 1           1/1/1900         Code:         Walk Sequence: 002150           1/1/1900         Code:         Walk Sequence: 002150           1/1/1900         Current: 51120         Days: 31           010         Current: 51120         Misc-4:           0wners Name:         Misc-5:           09/02/2020         Misc-5:           Charges Due         Last Bill         Past Due           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00           0.00         0.00         0.00

EXHIBIT

R

ompany				Prem	nise ID				1
- NORTH N	ANCH	IESTER WATER AS	SSN. $\vee$						
count Num	ber	Custome	r Name						
55610		SWAFFOR	RD, BRAN	DON #2					
istomer Pi	rofile	Charge	es Due		Payme	ents	М	eter/Util	ity
Account cre History fo		6/27/201	.9 🗐	•					
<ul> <li>Transac</li> <li>Billing</li> </ul>	tions	O Payments		ustments vice Order	rs				
O Reading	<u>js</u>	O Other Charges			Account Cha	anges	Disp	laying Cus	tome
Post D	Cd	Effective Date	Water	Sewer	Garbage	Vol-Fire	Service Tax	Other1	Oth
9/2/2020	Б	9/2/2020	41.57	0.00	0.00	0.00	0.00	0.00	
7/29/2020	В	7/29/2020	40.70						
6/29/2020	в	6/29/2020	39.14						
		and the second se							
6/1/2020	В	6/1/2020	39.33						
	B	6/1/2020 4/24/2020	39.33 30.81						
4/24/2020	14 T 18 18								
4/24/2020 4/1/2020	В	4/24/2020	30.81						
4/24/2020 4/1/2020 2/25/2020	B	4/24/2020 4/1/2020	30.81 34.10						
4/24/2020 4/1/2020 2/25/2020 1/28/2020	B B B	4/24/2020 4/1/2020 2/25/2020	30.81 34.10 32.67						
4/24/2020 4/1/2020	B B B B	4/24/2020 4/1/2020 2/25/2020 1/28/2020	30.81 34.10 32.67 31.30						
4/24/2020 4/1/2020 2/25/2020 1/28/2020 12/31/2019	B B B B B	4/24/2020 4/1/2020 2/25/2020 1/28/2020 12/31/2019	30.81 34.10 32.67 31.30 36.53						
4/24/2020 4/1/2020 2/25/2020 1/28/2020 12/31/2019 11/26/2019 10/28/2019	B B B B B B B	4/24/2020 4/1/2020 2/25/2020 1/28/2020 12/31/2019 11/26/2019	30.81 34.10 32.67 31.30 36.53 37.34						
4/1/2020 2/25/2020 1/28/2020 12/31/2019 11/26/2019	B B B B B B B B B B	4/24/2020 4/1/2020 2/25/2020 1/28/2020 12/31/2019 11/26/2019 10/28/2019	30.81 34.10 32.67 31.30 36.53 37.34 33.48						
4/24/2020 4/1/2020 2/25/2020 1/28/2020 12/31/2019 11/26/2019 10/28/2019 9/24/2019	B B B B B B B B B B	4/24/2020 4/1/2020 2/25/2020 1/28/2020 12/31/2019 11/26/2019 10/28/2019 9/24/2019	30.81 34.10 32.67 31.30 36.53 37.34 33.48 21.60	0.00	0.00	0.00	0.00	0.00	
4/24/2020 4/1/2020 2/25/2020 1/28/2020 12/31/2019 11/26/2019 10/28/2019 9/24/2019	B B B B B B B B B B B	4/24/2020 4/1/2020 2/25/2020 1/28/2020 12/31/2019 11/26/2019 10/28/2019 9/24/2019	30.81 34.10 32.67 31.30 36.53 37.34 33.48 21.60 21.60	0.00	0.00	0.00	0.00	0.00	