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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

LAWRENCE J. WOLTER,)
)
 Complainant,)
)
 JONATHAN CREEK WATER DISTRICT,)
)
 Defendant.)
)
)
)
)
)

CASE NO.
2020-00080

**COMPLAINANT’S RESPONSE TO
DEFENDANT’S DECLARATION AND EXHIBITS**

Pursuant to Schedule 1(b) of Defendant’s Response to Commission’s Order, the reading of Complainant’s meter for March 20, 2015, was 29,200. The reading for May 20, 2015, two months later, was 40,900. This shows a monthly average, for those two months, of 5,850, which is much higher than Complainant’s average usage of less than 1,000 per month both before and after these noted readings. To this, Complainant does not deny that he had a leak which increased his usage approximately six-fold.

The Defendant, however, is charging Complainant with having used 1,081,600 gallons of water in one month. The reading for April 20, 2015, per Defendant’s Schedule 1(b), was 1,140,000. The readings for the months of March and May are noted above. There has been no explanation as to how the usage would be over a million gallons less in the May 20, 2015 reading. The meter was tested and found to be working properly. The only explanation for such a discrepancy is that the meter was mis-read.

The usage is determined by subtracting the previous reading from the present reading. On May 20, 2015, the “previous” reading was 1,140,000 and the “present” reading was 40,900, giving

a *negative* usage of 1,099,100. Yet, the usage indicated for that month in Defendant's Schedule 1(b) was a positive 900 gallons. Again, there is no logical explanation for this discrepancy other than a mis-reading of the meter in April.

Complainant did not have access to the Defendant's reports when he admitted to having a leak. He still does not deny the leak, but seeks an adjustment of the amount owed based on the discrepancies revealed by these reports.

RESPECTFULLY SUBMITTED,

PRINCE & BRIEN, P.S.C.



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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically filed this 5th day of October, 2020, with the Public Service Commission at PSCED@ky.gov, and a true and correct copy mailed by first class U.S. Mail and email on same said date to the following:

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