

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	
JURISDICTIONAL STATUS OF SEVERAL)	CASE NO.
COMPANIES IN PIKE COUNTY, KENTUCKY)	2024-00271
AND OF THEIR COMPLIANCE WITH KRS)	
CHAPTER 278 AND 807 KAR CHAPTER 005)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO PRATER CONSTRUCTION LLC

Prater Construction LLC (Prater Construction), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on August 15, 2025. The Commission directs Prater Construction to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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 the person supervising the preparation of the response on behalf of the entity that the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Prater Construction shall make timely amendment to any prior response if Prater Construction obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Prater Construction fails or refuses to furnish all or part of the requested information, Prater Construction shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Prater Construction shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Regarding drinking water, identify each address of any residential or commercial buildings/structures located in or near the Zebulon Heights Community² that Prater Construction participated in providing, or is providing, water for public consumption (water service).

² The Zebulon Heights Community is a small area located off US 119. It includes all residential and commercial structures located on Village View Drive, Devin Ryans Way, Zebulon Heights, Boulders East and Prater Drive all side streets.

2. For each address identified in Item 1, state whether Prater Construction installed a meter, had one installed, or is monitoring a meter previously installed, and provide the following information regarding the installed meters:

- a. State whether the buildings/structures are individually metered or jointly metered.
- b. State whether Prater Construction reads the meters.
- c. State whether Prater Construction submits water service bills to the property owners.
- d. State how overdue water service bills are collected.
- e. Confirm if there are water service bill payment plan options. If not confirmed, explain the response. If confirmed, provide a copy of the bill payment plan policy
- f. Identify water service bill due date extensions.
- g. Identify Financial Assistance programs to assist in satisfying water service bills.
- h. Describe and, if written, provide a copy of any water service disconnection policies.
- i. Describe and, if written, provide a copy of any policies on late fees and penalties related to water service.

3. For each address identified in Item 1, state whether Prater Construction installed service lines and provide the following information regarding the installed service lines:

a. State whether Prater Construction obtained a permit before starting installation.

b. If Prater Construction installed service lines, confirm that the lines were inspected by the Department of Housing, Buildings & Construction, Division of Plumbing. If not confirmed, explain why not.

c. If inspected, provide proof of compliance with the Kentucky State Plumbing Code.

d. If Prater Construction installed the service lines, state the diameter of the lines.

4. For each address identified in Item 1 state whether Prater Construction installed any other fixtures, such as a pump station. If so, state whether those fixtures were inspected by the Department of Housing, Buildings & Construction, Division of Plumbing and provide proof of compliance with the Kentucky State Plumbing Code.

5. For each address identified in Item 1 state whether Prater Construction is involved with diverting, developing, pumping, impounding, distributing, or furnishing water for public consumption.

6. For each address identified in Item 1 state whether Prater Construction ever filed an annual report with the Commission.

7. For each address identified in Item 1 state whether Prater Construction filed a tariff with the Commission.

8. For each address identified in Item 1 state whether Prater Construction is a party to any contractual agreements, whether written or verbal regarding diverting,

developing, pumping, impounding, distributing, or furnishing water for public consumption.

9. For each address identified in Item 1 provide copies of any written contract(s) that Prater Construction is a party to involving diverting, developing, pumping, impounding, distributing, or furnishing water for public consumption.

10. Regarding wastewater treatment, identify each address of any residential or commercial buildings/structures located in or near the Zebulon Heights Community that Prater Construction participated in providing, or is providing sanitary sewer service.

11. For each address identified in Item 10 provide the following:

- a. State what type of wastewater treatment system was installed;
- b. State the capacity of each system; and
- c. State who installed each system.

12. If a septic system or lagoon wastewater treatment system was installed, state whether an individual system and leach field was installed for each address, or multiple addresses that share the wastewater treatment system.

13. If the wastewater treatment system serves multiple addresses, state the coordinates of the system and state the person or persons own the real property the system is located on.

14. For each address identified in Item 10 state whether the wastewater treatment system was approved and inspected by the local health department. If so, provide written proof.

15. For each address identified in Item 10 state whether there are multiple addresses connected to one system and who owns the wastewater treatment system. If

there are multiple addresses connected to one system, identify who operates the wastewater treatment system.

16. If a package plant was installed, identify who installed the package plant and provide the following:

a. State whether a construction permit obtained from the Energy and Environment Division of Water to build the wastewater treatment plant (plant).

b. Identify the owner of the plant.

c. Identify the operator of the plant.

d. State whether a Kentucky Pollutant Discharge Elimination System permit obtained for the plant.

e. State what body of water the plant discharges into.

f. State the coordinates of the package plant.

g. State who owns the real property the package plant is located on.

h. State whether any other type of system was installed such as a spray irrigation system, who installed it, who owns it, and who operates it.

17. For each address identified in Item 10, state whether Prater Construction is involved in the collection, transmission, or treatment of sewage.

18. State whether Prater Construction ever filed an annual report with the Commission regarding wastewater treatment.

19. State whether Prater Construction filed a tariff with the Commission regarding wastewater treatment.

20. For each address identified in Item 10, state whether they are subject to regulation by a metropolitan sewer district, or any sanitation district created pursuant to KRS Chapter 220.

21. For each address identified in Item 10 state how the fees for sewage treatment are collected and how overdue bills are collected. In addition, provide the following: State whether there are policies for payment plan options.

- a. State whether there are policies for due date extensions.
- b. State whether there are Financial Assistance programs available.
- c. State the disconnection policies.
- d. Provide the policies for late fees and penalties.
- e. State whether there is budget billing option available to customers.

22. State when Prater Construction intends to file the required response to the allegations contained in the October 1, 2024 Order as required by ordering paragraph 3 of said Order.

23. State whether Prater Construction intends to continue providing water service, and if not, state whether Prater Construction contacted any other entities regarding taking over the water service and state the name of the entity.



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DATED AUG 06 2025

cc: Parties of Record

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