



Ernie Fletcher
Governor

LaJuana S. Wilcher, Secretary
Environmental and Public
Protection Cabinet

Christopher L. Lilly
Commissioner
Department of Public Protection

Commonwealth of Kentucky
Public Service Commission
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Frankfort, Kentucky 40602-0615
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Mark David Goss
Chairman

Teresa J. Hill
Vice Chairman

Gregory Coker
Commissioner

Donnie E. Lowery
2025 Chrisman Mill Road
Nicholasville, KY 40356

April 27, 2006

RE: Case No. 2005-00544

Please see enclosed data request from Commission Staff in the above case.

If you need further assistance, please contact John (Robert) Cowan at (502) 564-3940 ext. 247.

Sincerely,

A handwritten signature in black ink, appearing to read "Beth O'Donnell".

Beth O'Donnell
Executive Director

BOD/sh
Enclosure



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Honorable Bruce E. Smith
Attorney At Law
Moynahan, Irvin & Smith, P.S.C.
110 North Main Street
Nicholasville, KY 40356

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Sincerely,

Beth O'Donnell
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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DONNIE E. AND DELORES A. LOWERY)	
)	
COMPLAINANTS)	
)	
V.)	CASE NO. 2005-00544
)	
JESSAMINE-SOUTH ELKHORN)	
WATER DISTRICT)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST DATA REQUEST
TO DONNIE E. AND DELORES A. LOWERY

Pursuant to 807 KAR 5:001, Commission Staff requests that Complainants Donnie E. And Delores A. Lowery file the original and eight copies of the following information within 15 days of the date of this request. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility.

1. In its answer to your complaint, Jessamine-South Elkhorn Water District ("Jessamine-South Elkhorn") states that occupants of your farm have had water supplied to them for several years from the city of Nicholasville ("City"), but that the service line on the farm has fallen into disrepair resulting in large losses of water. They further state that the City has asked that you repair the line on your farm in order to restore service.

a. If you agree with these statements, explain why the lines have not been repaired. Describe all conversations with representatives of the City and provide the estimated cost of repair.

b. If you do not agree with these statements, identify the portions of the statements that you do not agree with and explain the reasons that you do not agree.

c. Explain why you would need to lay 1,500 feet of line to connect to the City.

2. Your complaint states that in October 2005, Jessamine-South Elkhorn confirmed that they would furnish water to your home. Describe all conversations with any individual regarding this claim and include the dates of the conversations.

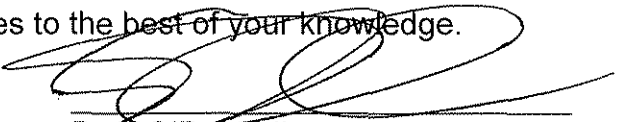
3. Provide copies of any letters, bills, contracts for service, canceled checks, or other documents that relate to this matter.

4. Provide the date that water to your home was disconnected.

5. Your complaint states that you do not have water. Explain how or where you are currently obtaining water for your necessary requirements.

6. Do you own the farm or the mobile home where you live? If not, identify the owner of the farm and mobile home and your relationship, if any, to the owner.

7. Provide a detailed map of the property to be served showing all structures, water lines, and measurements between facilities to the best of your knowledge.



Beth O'Donnell
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: April 27, 2006

cc: Parties of Record

Case No. 2005-00544