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March 14, 2006

RECEIVED

MAR 1 5 2006

PUBLIC SERVICE
COMMISSION

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602-0615

Re: Farmdale Development Corporation: Case No. 2006-00028

Dear Ms. O'Donnell:

WILLIAM P. CURLIN, JR.

DANDRIDGE F. WALTON

JOHN B. BAUGHMAN

CLAYTON B. PATRICK SQUIRE N. WILLIAMS III

ROBERT C. MOORE

Enclosed please find the original and eleven copies of the Motion of Farmdale Development Corporation for Informal Conference in the above-referenced action. Please stamp file one copy and return to me in the enclosed, self-addressed stamped envelope. I appreciate your assistance in this matter.

Please contact me if you have any questions.

Robert C. Moore

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Enclosures RCM/neb

cc: Larry Smither

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

MAR 1 5 2006

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

THE APPLICATION OF FARMDALE DEVELOPMENT CORPORATION FOR ADJUSTMENT IN RATES

Case No. 2006-00028

MOTION OF FARMDALE DEVELOPMENT CORPORATION FOR INFORMAL CONFERENCE

Comes the Applicant, Farmdale Development Corporation ("Farmdale"), by counsel, and for its Motion for Informal Conference, states as follows:

On January 19, 2006, the above styled Application for Adjustment in Rates ("Application") was filed on behalf of Farmdale. Included with the Application was a request for a monthly construction surcharge so that badly needed capital improvements could be made to the subject wastewater treatment plant, including capital improvements to the remote lift station. The single remote lift station associated with this Wastewater Treatment Plant was installed over thirty (30) years ago when the Farmdale subdivision was built. The remote lift station is of fiberglass construction and has two pumps. The two pumps in the remote lift station are over ten (10) years old and were in very poor condition at the time the Application was filed.

Since the filing of the Application, the two pumps at the remote lift station have failed. The Applicant has incurred substantial costs in paying for service runs made to this remote lift station. Additionally, one of the pumps had to be substantially reworked by Quality Electric in Louisville at a cost of \$1,600. This pump was reinstalled after this "band aid", interim repair was completed. However, this pump cannot be relied to continue to operate for an extended period of time. The second pump at the remote lift station is now undergoing repair at Quality Electric. If

this pump can be repaired, it will not be reinstalled in the remote lift station because the guide rails, the guide rail brackets and the discharge piping are in such bad shape. Instead, the second pump will be retained as a "back up" to the first pump. This second pump also should not be relied upon to operate for an extended period of time if it is necessary to place it into service. Furthermore, the entire remote lift station is in extremely bad repair and needs to be replaced as soon as possible.

The Farmdale Development Corporation has obtained a quote to replace the remote lift station and all of the equipment, including the pumps and the internal piping, for a cost of approximately \$30,425.00. Because this work needs to be done as soon as possible, and the process to review the Application for Adjustment in Rates takes at least 6 to 8 months, Farmdale hereby moves the Public Service Commission to schedule an informal conference to discuss the possibility of approving that part of the surcharge applicable to the remote lift station on an expedited basis.

Respectfully Submitted

Robert C. Moore

Hazelrigg & Cox, LLP

415 West Main Street, 1st Floor

P.O. Box 676

Frankfort, Kentucky 40602-0676

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by first class mail, postage prepaid, on David Edward Spenard, Assistant Attorney General, 1024 Capital Center Drive, Suite 200, Frankfort, Ky., 40601-8204 on this the 14th day of March, 2006.

Robert C. Moore