

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT PETITION OF THE CITY OF PIKEVILLE)
AND MOUNTAIN WATER DISTRICT FOR THE) CASE NO. 2006-00123
TRANSFER OF CERTAIN WASTEWATER)
FACILITIES AND RELATED DEBT)

COMMISSION STAFF'S SECOND SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO MOUNTAIN WATER DISTRICT

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Mountain Water District ("Mountain District") file the original and 5 copies of the following information with the Commission within 5 days of the date of this request, with a copy to all parties of record. Each copy of the information requested shall be placed in a bound volume with each item tabbed. 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 shall be given to copied material to ensure its legibility. 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.

1. Provide the balances as of July 1, 2006 for the following debt instruments:
 - a. RD Bond 92-19;
 - b. KIA Loan A95-16; and,
 - c. KIA Loan 00-03.

2. Provide an income statement for Mountain District's sewer operations reflecting all income and expenses for one year of operations for a period ending on or after December 31, 2005.

3. Provide an income statement for Mountain District's sewer operations reflecting the removal of all income and expenses associated with the Mossy Bottom Sewage Collection System. This income statement should be for the same period as the income statement provided in response to Item 2. Provide all workpapers, show all calculations, and state all assumptions used to prepare this statement.

4. Provide the original cost of the facilities that Mountain District proposes to transfer. If Mountain District is unable to provide the actual original cost, provide an estimate of the original cost, a description of how these estimates were derived and an explanation of why the original cost cannot be provided.

5. Provide the amounts related to the facilities that Mountain District proposes to transfer that are currently recorded in Account 108, Accumulated Depreciation; Account 252, Advances for Construction; and, Account 271, Contributions in Aid of Construction. If the amounts provided are not based upon actual costs, explain why they are not based upon actual cost and describe how the amounts were derived.



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

DATED: July 5, 2006

cc: Parties of Record