COMMONWEALTH OF KENTUCKY

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BEFORE THE PUBLIC SERVICE COMMISSION

JAN 16 2007 PUBLIC SERVICE

COMMISSION

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE)
WATER SERVICE RATES OF THE FRANKFORT) CASE NO. 2006-00444
ELECTRIC & WATER PLANT BOARD)

ELKHORN AND PEAKS MILL WATER DISTRICTS'
INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS TO
FRANKFORT ELECTRIC & WATER PLANT BOARD

Comes the Elkhorn Water District ("Elkhorn") and Peaks Mill Water District ("Peaks Mill"), by counsel, pursuant to the Public Service Commission's Order and hereby tender their interrogatories and requests for production of documents to Frankfort Electric & Water Plant Board ("FPB").

- 1. Please list by category the costs and expenses which have been attributed or assigned to Elkhorn and Peaks Mill by FPB in its calculation of rates to these customers.
- 2. Has the FPB charged or included in its rates for Elkhorn and Peaks Mill, at any time, the costs or expenses associated with the construction or maintenance of the water transmission line that connects FPB to Georgetown Municipal Utilities?
- a. If so, please specifically describe and state the costs or expenses, how the amounts charged were calculated, and when the expense was included in rates.
- 3. Has FPB charged or included in its rates for Elkhorn or Peaks Mill, at any time, the costs or expenses associated with the construction or maintenance of the water transmission line that connects FPB and South Anderson Water District?

- a. If so, please specifically describe and state the costs or expenses, how the amounts charged or assigned were calculated, and when the cost or expense was included in rates.
- 4. Provide any cost of service calculations or analysis that was prepared in conjunction with the most recent rate increase that was levied on FPB wholesale customers prior to this rate adjustment now proposed.
- 5. Provide a specific statement of the costs or expenses that have necessitated the increase in rates since the rate increase effective in the last quarter of 2005.
- 6. If FPB has not implemented or filed for the rate increase proposed in the cost of service study for each customer class, please explain the reason(s) for the deviation(s).

Respectfully submitted,

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Counsel for Elkhorn Water District and Peaks Mill Water District

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been sent by first-class mail, postage prepaid, on this date, January 16, 2007, to the following:

Hance Price, Esq. Frankfort Plant Board 317 W. Second Street P.O. Box 308 Frankfort, KY 40602

John N. Hughes, Esq. 124 W. Main Street Frankfort, KY 40601

Donald T. Prather, Esq. 500 Main Street, Suite 5 Shelbyville, KY 40065

Thomas A. Marshall