



Steven L. Beshear  
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Robert D. Vance, Secretary  
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Timothy J. LeDonne  
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Commonwealth of Kentucky  
**Public Service Commission**  
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Mark David Goss  
Chairman

John W. Clay  
Vice Chairman

Caroline Pitt Clark  
Commissioner

Honorable David Edward Spenard  
Assistant Attorney General  
Office of the Attorney General Utility & Rate Intervention Division  
1024 Capital Center Drive  
Suite 200  
Frankfort, KY 40601-8204

February 18, 2008

RE: Case No. 2007-00461

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

If you need further assistance, please contact my staff at (502) 564-3940.

Sincerely,

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

Beth O'Donnell  
Executive Director

BOD/tw  
Enclosure



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February 18, 2008

David T. Wilson  
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550 West Lincoln Trail Boulevard  
P.O. Box 610  
Radcliff, KY 40160

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

HARDIN COUNTY WATER DISTRICT NO. 1'S )  
PROPOSED TARIFF ALLOWING THE USE OF )  
MASTER METERS IN MANUFACTURED ) CASE NO. 2007-00461  
HOUSING COMMUNITIES )

FIRST DATA REQUEST OF COMMISSION STAFF  
TO HARDIN COUNTY WATER DISTRICT NO. 1.

Hardin County Water District No. 1 ("Hardin County"), pursuant to 807 KAR 5:001, is to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on or before March 3, 2008. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response 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 person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Hardin County shall make timely amendment to any prior responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any requests to which

Hardin County fails or refuses to furnish all or part of the requested information, Hardin County shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied 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.

1. Refer to the Advance Prepared Testimony of Jim Bruce. Provide a signed affidavit of Mr. Bruce attesting to the truth and accuracy of the Advance Prepared Testimony. Alternatively, Hardin County may incorporate that testimony into its response to this item.

2. Refer to the proposed tariff, Sheet 7 B-2, No. 4, Policy Regarding Deposits.

- a. State whether these proposed provisions supplement Hardin County's current deposit policies.

- b. If the proposed deposit provisions supplement the current policies, state which of the existing policies, if any, would not apply to the proposed master metering tariff.

3. Refer to the proposed tariff, Sheet 7B-3, No. 5, Notice of Service Interruption, paragraph (d).

a. State whether Hardin County would be willing to amend the language of the proposed tariff to require the district to publish public notice of a disconnection.

b. If the district finds this to be unreasonable, state why.

4. Refer to the proposed tariff, Sheet 7B-4, No. 7, Selective Termination, paragraph (b). Provide the average cost for a plumber's certification letter and a laboratory test for contaminants.

5. Refer to the proposed tariff, Sheet 7B-8, Private Property Metering Agreement, No. 6. State the legal authority or argument permitting utilities and customers to waive Commission regulations.

6. Identify the name and mailing address of each of the manufactured housing communities ("MHC") within your service area.

7. For each MHC, identify the amount of water delivered through the master meter and the amount of water billed to all accounts within the MHC for each of the last 12 months.

8. Provide every master meter test result for each of the MHCs since January 1, 2007.

9. Provide the most recent test result for all individual meters within each of the MHCs since January 1, 2007.

10. State whether the calculated line loss could be attributable to inaccurate individual meters within the MHCs. If not, state why that is an unreasonable conclusion.

11. Refer to Mr. Bruce's Advance Prepared Testimony, page 1, answer 1.

a. State whether Hardin County agrees that the changes from master meters to individual lot meters made in the mid-1980s conflicted with then-existing utility regulations. Explain.

b. State whether Hardin County is of the opinion that the present individual metering system conflicts with 807 KAR 5:066, Section 12. Explain.

c. State whether Hardin County inspected these service lines, pursuant to 807 KAR 5:066, Section 9.

12. Refer to Mr. Bruce's Advance Prepared Testimony, page 1, answer 6. Provide all documentation of instances in which fecal or E. coli bacteria was present in water that had a filled meter pit.

13. Provide all correspondence with MHCs regarding Hardin County's proposed tariff.

14. State whether Hardin County has informed all MHCs of their opportunity to intervene in the proceeding before the Commission.

15. a. State whether any MHCs have requested assistance from Hardin County in locating leaks within their water lines.

b. If so, state how the district handled these requests.

c. Describe the assistance that Hardin County could provide and the costs for such assistance.

16. Refer to 807 KAR 5:066, Sections 1 and 12, which provide that a customer shall maintain the water line from the meter to the point of consumption. State why it is Hardin County's position that the district should not be responsible for maintaining all water lines up to a customer's individual meter.

17. Refer to Hardin County's current tariff, Sheet 7, Meter Connections, No. 9.
- a. State whether the proposed tariff provisions would conflict with this current provision.
- b. If so, state Hardin County's position regarding how the current provision should be amended.
18. State whether, if approved, the provisions of this proposed tariff would create a new customer class for Hardin County under Sheet 9 of its current tariff.



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

Dated: February 18, 2008

cc: Parties of Record