

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JULIA LYNN JOHNSTONE)
)
)
) COMPLAINT)
) V.) CASE NO. 2008-00502
)
) SOUTH ANDERSON WATER DISTRICT)
)
)
) DEFENDANT)

COMMISSION STAFF'S SUPPLEMENTAL INTERROGATORIES
TO
SOUTH ANDERSON WATER DISTRICT

Pursuant to 807 KAR 5:001, Commission Staff requests that South Anderson Water District ("District") file the original and six copies of the following information with the Commission no later than October 23, 2009, with a copy to all parties of record.

Responses to requests for information shall be appropriately bound, tabbed and indexed and 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 shall 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.

The District shall make timely amendment to any prior response 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 request to which


the District fails or refuses to furnish all or part of the requested information, it 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 operation.

1. What is the specific distance between the meter box and the damage site on the District's side of the meter where the repairs were made?
2. Define "inlet side" and "outlet side" as used by the District in response to Question 28 of Commission Staff's first information request.
3. Describe the exact damage and how was it first noticed.
4. What specific steps were taken to repair the damage?
5. Explain why turning water on and off at the meter box would cause damage.
6. How many other instances have there been where damage was caused by water being turned on and off at the meter box? Was this prior damage similar to that in this case?
7. Other than water being turned on and off at the meter box, which the District claims to have caused the damage, what other factors could explain the type of damage experienced in this matter?

(a) Explain how using a "vise-grip" could cause the damage the District claims it caused.

(b) What else could have caused the damage, i.e. tool, machine or other?



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DATED: OCT 15 2009

cc: Parties of Record

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