

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**CASE NO. 2008-00513**

**RECEIVED**

FEB 13 2009  
PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF:

TAMMY ROGERS	)	
	)	
COMPLAINANT	)	CASE NO.
	)	2008-00513
V.	)	
	)	
NORTHEAST WOODFORD	)	
WATER DISTRICT	)	
	)	
DEFENDANT	)	

**ANSWER**

Comes now Northeast Woodford Water District, by and through counsel, and for its Answer to the Complaint states as follows:

1. Northeast Woodford Water District affirmatively denies that it overcharged the Complainant, Tammy Rogers, for water usage at 114 Chestnut Lane, Versailles, Woodford County, Kentucky, during the month of November, or any other time stated in her Complaint;
2. Northeast Woodford Water District affirmatively denies that water meters were not read properly for the period of time alleged in the Complaint, or that actual readings were not performed;
3. Northeast Woodford Water District admits that on or about November 18, 2008, a letter was sent to Northeast Woodford Water District customers regarding a water standards violation; however, Northeast Woodford Water District affirmatively denies

any correlation between Mrs. Rogers and/or Mrs. Rogers family's alleged illness and the water standards violation, or that such notification was not timely.

**STATEMENT IN DEFENSE OF COMPLAINANT'S ALLEGATIONS**

Comes the Defendant, Northeast Woodford Water District, and for its statement in defense of Complainant's allegations, states the following:

4. That Northeast Woodford Water District held a meeting on December 2, 2008, to discuss high water bill complaints from customers, including Mrs. Rogers. At this meeting, it was decided that Dale Gatewood, Superintendent of Maintenance, would personally re-read the water meters of all customers who complained of high water bills, including Mrs. Rogers. Dale Gatewood personally re-read Mrs. Rogers' water meter, who ascertained that said meter was read correctly.

5. That Dale Gatewood addressed the issue of meter reading at the aforementioned meeting, affirming that water meters were read and that he had found no errors when checking whether or not said meters were read.

6. That Mrs. Rogers was charged only for the water that went through her meter during the time alleged in the Complaint or any other time, and that Dale Gatewood confirmed that Mrs. Rogers' meter was read correctly.

7. That the purpose of the letter sent by the Northeast Woodford Water District on or about November 18, 2008, was to inform customers that coliform bacteria was found in two of its water samples during the month of August, 2008. Coliform bacteria are naturally present in the environment and are generally not harmful, though its presence may indicate potential problems. Further testing done by the Northeast Woodford Water

District showed that other bacteria, such as fecal coliform or E. coli, was not detected and that the coliform issue had been resolved.

8. That Northeast Woodford Water District has complied with the terms set forth in its tariff, as well as all applicable Kentucky Administrative Regulations.

9. Northeast Woodford Water District has responded to expressions of concern from Mrs. Rogers, and has at all relevant times attempted to address those concerns. Northeast Woodford Water District will continue to work with Mrs. Rogers as to any continuing concerns, but the Water District affirmatively contends that this Complaint should be dismissed.

COMBS & HOFFMAN

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ATTORNEYS FOR NORTHEAST WOODFORD  
WATER DISTRICT

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing Answer and Statement in Defense of Complainant's Allegations was served on Tammy Rogers, 114 Chestnut Lane, Versailles, Kentucky 40383, by United States First Class Mail.

All this the 13<sup>th</sup> day of February, 2009.

Cassie G. Wells  
CASSIE G. WELLS