

Motion To Intervene

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COMMISSION

April 14, 2009

Duvall Mobile Home Park
1255 South Wilson Road
Radcliff, KY 40160

Public Service Commission
Att. Mr. Jeff Derouen
211 Sower Boulevard
P.O. 615
Frankfort, KY 40602

To Whom It May Concern,

I am writing this letter in regard to Hardin County Water District 1 and the master meter for mobile home parks, (case no. 200900113.) I am asking that the PSC grant a right for a full intervention as stated in 807 KAR 5:001 section 3 (8). We own Duvall Mobile Home Park located at 1255 South Wilson Road Radcliff KY 40160, we have a very special interest in this case and ask that the PSC intervene.

We believe that if the PSC grants HCWD 1 tariff several major problems will occur.

1. Our tenants will lose their say in the public utility. The rights that they our granted under the PSC will not apply to the mobile home park owners.
2. The right to turn off service to a tenant for non-payment. Do I as a landlord have that right to turn off a service? If yes, whom does the tenant complain too?
3. If we go to a master meter, can we charge any price to our tenants for water service?
4. Why should we and our tenants be compared to all other mobile home park that HCWD 1 serves. Many of the issues that HCWD 1 has with mobile home parks such as, water leaks, sewer back-ups, meter placement, and dog pins does not apply to our park. In fact our park according to HCWD 1 study had very little to any in water loss.
5. We along with all other MHP have offer to grant easements to HCWD 1. All other utilities companies, KU, LG&E, Insight Cable and Nolin Recc have easements on to the properties and there has never been any issues.

6. Many of the issues that HCWD 1 has with the MHP have been drastically reduced. Two of the major parks with problems have been closed. So I believe that we are being treated unfairly and punished by a district that is trying to cut costs.
7. The new tariff I believe is unreasonable due to the fact that it gives MHP two options. The first, to move all meters to the main road in the park and update any entire water and sewer system, or just go to a master meter. Not much of a choice. Spend a million or just close.
8. I believe that the HCWD 1 is trying to make us a water provider. We are not in the business of providing a utility.
9. Will I have to test the water supply?
10. Will HCWD 1 return or give all deposits to park owners or customer that paid when they turn on an account or will they simply keep it?

I believe that any action by HCWD 1 to make all parks go to a master meter is unreasonable. In the late 80's the district asked all parks on a master meter to put in individual meters at the lot space, these meters had to be purchased by park owners from the district and that process has continued until today. I hope that PCS grants us a MOTION TO INTERVENE on this case. Too many issues need to be addressed.

Sincerely,



James Duvall
(270) 319-8301