COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

NORTHERN KENTUCKY WATER DISTRICT'S PROPOSED ADDITIONS TO SUBDISTRICT F AND NOTIFICATION OF MODIFICATIONS TO PREVIOUSLY APPROVED CONSTRUCTION PROJECTS

CASE NO. 2009-00262

COMMISSION STAFF'S FIRST SET OF INFORMATION REQUESTS

Pursuant to 807 KAR 5:001, Northern Kentucky Water District ("NKWD") shall file with the Commission no later than September 4, 2009, the original and five copies of the following information, with a copy to all parties of record. Responses to these requests 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 the 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.

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

Careful attention shall be given to copied material to ensure its legibility. 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.

Refer to NKWD's Response to the Commission's Order of July 13, 2009,
Item 7. State the number of surcharges that NKWD will assess to Pendleton County
Water District.

2. If NKWD proposes to assess Pendleton District only one surcharge:

a. Explain why the assessment of a single surcharge is reasonable.

b. State whether this treatment is consistent with the treatment that NKWD has applied to Bullock Pen Water District in its assessment of the Subdistrict C Surcharge.¹ Explain.

Jeff Derouen

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

DATED: AUG 2 8 2009

cc: Parties of Record

¹ See Case No. 2000-00237, Water Purchase Agreement Between Northern Kentucky Water Service District and Bullock Pen Water District (Ky. PSC Oct. 30, 2000).

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Honorable John N Hughes Attorney at Law 124 West Todd Street Frankfort, KY 40601