

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In The Matter Of:

AN INVESTIGATION INTO THE CONDITION AND)
MANAGEMENT OF BIG VALLEY SANITATION,) CASE NO 2009-00378
INC., AND WOODLAND ACRES SANITATION, INC)
SEWAGE TREATMENT FACILITIES)

STATEMENT OF ISSUES

Comes now, THE ESTATE OF JOHN L. FORD, (hereinafter referred to as THE ESTATE), and in response to THE PUBLIC SERVICE COMMISSION'S request for statement of the issues that it should consider, states as follows:

Since the death of John L. Ford, on October 19, 2008; and the appointment of Charles V. Gribbons as his Executor, on November 7, 2008; other than keeping the electric service on at the Woodland Acres facility, THE ESTATE has not had the financial nor technical resources to manage and/or operate either facility, and has taken no action in their operation.

Although there are some records which indicate that John L. Ford had some ownership interest in these facilities, it is THE ESTATE'S position that he actually had little, if any legal ownership rights, although he apparently had been operating both facilities under some authority granted by an appropriate governmental unit. He neither owned nor had any ownership interest in either mobile home park. He was not the owner of the land on which the Woodland Acres facility sits. That land has always been, and to the best belief of THE ESTATE is owned by the original developer, SAM HARDY. The land on which the Big Valley Facility sits, is owned by a Corporation and it does appear that John L. Ford was an organizer of that entity, but THE ESTATE has not been able to determine its actual shareholders/directors, if any in addition to John L. Ford., nor does the estate have or has been able to determine, the specific ownership interest, if any, that John Ford had in said corporation(s)

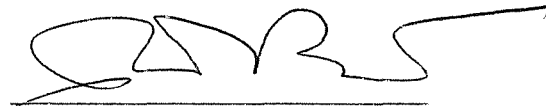
At the death of John Ford, it did appear that he possibly had some significant ownership interest in both facilities, but the position of the estate now is that he merely had authority to operate the facilities, and that he had, minimal, if in fact any, financial or legal ownership/interest.

Counsel for THE ESTATE has had recent communication with Mr Joe Murphy, who advises that he and an associate who has extensive knowledge and experience in running and maintaining similar facilities, have been operating the Woodland Acres Facility. He advises that his actions have been with the approval of the Bullitt County authorities. He states that he has invested a substantial amount of money in this project, has installed and repaired equipment, and that the facility is now functioning properly.

The estate of John Ford has no interest in operating either facility; makes no financial or other claim against either facility, and upon proper order, it is ready and willing to convey and all interest, if any, that it may have in either facility.

Finally, it is of no financial or other benefit to THE ESTATE, but if not already done so, THE ESTATE encourages the Commission to consider the request of Mr Joe Murphy to assume the responsibility of operating the Woodland Acres facility.

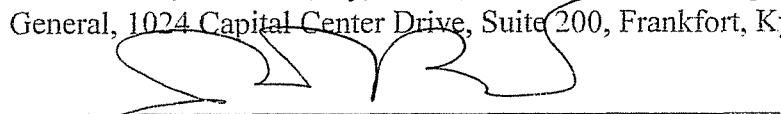
RESPECTFULLY SUBMITTED



ROBERT J. BOHNERT
Counsel for Estate of John Ford
And for Charles Gribbons, Executor
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CERTIFICATION

It is hereby certified that on this 11th day of January, 2010, the original of this document was mailed to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Blvd, Frankfort, Ky, 40601; and copies were mailed to Josh W. Nacey, Office of General Counsel, 200 Fair Oaks, 1st Floor, Frankfort, Ky, 40601 (Counsel for Energy and Environment Cabinet); Sandy Gruzesky, Director of Water, 200 Fair Oaks Drive, Fourth Floor, Frankfort, Ky, 40601; and David Edward Spenard, Assistant Attorney General, 1024 Capital Center Drive, Suite 200, Frankfort, Ky, 40601



Counsel for Estate of John Ford and Charles Gribbons, Extr