COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PRO MAN PROPERTY MANAGEMENT, LLC)
REQUEST FOR DEVIATION FROM 807 KAR) CASE NO. 2013-00286
5:071, SECTION 7(4))

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO PRO MAN PROPERTY MANAGEMENT, LLC

Pro Man Property Management, LLC ("Pro Man Property"), pursuant to 807 KAR 5:001, shall file with the Commission no later than November 1, 2013, the original and ten copies of the following information, with a copy to all parties of record. Responses to requests for information 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 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.

Pro Man Property 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 Pro Man Property 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.

- State whether the requested deviation is sought for Pro Man Property's
 South Hill Subdivision Sewer Plant.
- 2. List and provide a copy of each notice of violation ("NOV") that Pro Man Property has received regarding the operation of its sewer facilities from the Kentucky Division of Water since January 1, 2008. State the current status of each NOV.
- 3. List and describe each complaint that that Pro Man Property has received regarding the operation of its sewer facilities from the Northern Kentucky Health Department since January 1, 2008.
- 4. List the name of each person that Pro Man Property employs as a certified wastewater treatment plant operator for its South Hill Subdivision Sewer Plant.
- 5. Provide a copy of each contract currently in effect that Pro Man Property has for the provision of certified wastewater treatment plant operator services for its South Hill Subdivision Sewer Plant.
- 6. Provide a copy of each contract currently in effect and not provided in response to Request 4 that Pro Man Property has for maintenance services for its South Hill Subdivision Sewer Plant.

- 7. Pro Man Property reported incurring total maintenance expenses of \$6,970 for the year ending December 31, 2012. Identify and describe the major components of this expense.
- 8. Describe the mechanical equipment of the South Hill Subdivision Sewer Plant.
- 9. State how frequently South Hill Subdivision Sewer Plant's mechanical equipment is currently inspected.
- 10. State the current cost of inspecting South Hill Subdivision Sewer Plant's mechanical equipment.
- 11. State the annual cost of inspecting South Hill Subdivision Sewer Plant's mechanical equipment if inspections are conducted on a daily basis. Describe how this annual cost was derived.
- 12. In his letter of July 3, 2013, to the Public Service Commission, Mr. Brett Cade refers to a "substantial burden" that will result if daily inspections of mechanical equipment must be performed. Describe this "substantial burden."
- 13. Describe the actions necessary for Pro Man Property to implement daily inspections of its South Hill Subdivision Sewer Plant.
- 14. Describe all alarm systems and monitoring systems that are installed at the South Hill Subdivision Sewer Plant that would enable Pro Man Property or its agents to monitor or detect problems at the sewer facility without conducting an onsite inspection.
 - 15. State the location of the South Hill Subdivision Sewer Plant.

16. Describe the area in the immediate vicinity of the South Hill Subdivision Sewer Plant. This description should include the presence of residential neighbors, schools, nursing home facilities, and industries.

Jeff Deroueh

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, Kentucky 40602

DATED OCT 2 1 2013

cc: Parties of Record

Brett Cade Pro Man Property Management, LLC dba South 200 Water Works Road, Office B Fort Thomas, KY 41075