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Public Service  
Commission

COMMONWEALTH OF KENTUCKY BEFORE  
THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CUNNINGHAM WATER )  
DISTRICT REQUESTING DEVIATION FROM )  
REQUIREMENTS OF 807 KAR 5:006, SECTION ) CASE NO. 2016-00422  
14(2) )

**CUNNINGHAM WATER DISTRICT'S ANSWERS TO  
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
CUNNINGHAM WATER DISTRICT**

Cunningham Water District ("Cunningham District"), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and six copies of the following information. The information requested herein is due within 14 days of the date of this request. 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 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.

Cunningham District 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 Cunningham District 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. When filling a paper containing personal information, Cunningham shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide the following information concerning Cunningham District's office:

a. State the location of the office and describe the office facility,

including the number of rooms and square footage;

**ANSWER:** The Cunningham Water District office is located in the front lobby of the Cunningham Fire Department. The square footage of the office is approximately 80 square feet. It is located at 7506 US-62, Cunningham, KY 42035.

b. State whether Cunningham District receives mail at its office;

**ANSWER:** Cunningham Water District does not receive its mail at the office directly, but instead uses a PO Box at the Cunningham Post Office.

c. State how frequently Cunningham District inspects the payment drop box located at the office for the receipt of payments;

**ANSWER:** The payment drop box at the Cunningham Water District Office is checked daily.

d. State whether the telephone number for Cunningham District is for a telephone located within the office;

**ANSWER:** The phone number listed for Cunningham Water District reaches a phone that is located inside of the office.

e. State how often the voice mail for the telephone number for Cunningham District is checked for messages;

**ANSWER:** The voicemail for the phone in the Cunningham Water District is checked approximately 5 times a week.

f. State the uses of the office by Cunningham District employees;

**ANSWER:** The office is used by Cunningham Water District as a place to store office supplies for billing purposes.

g. State whether Cunningham District is currently in compliance with 807 KAR 5:006, Section 14(1)(b)2, by making a designated representative available during Cunningham District's established working hours not fewer than seven hours per day, one day per week. If Cunningham District is not currently in compliance with 807 KAR 5:006, Section 14(1)(b)2, state the date when Cunningham District was last in compliance with this administrative regulation.

**ANSWER:** Cunningham Water District does not currently have office hours of at least seven hours a day, one day per week, nor has the system ever had this put into practice.

h. State how often Cunningham District currently has a representative or representatives at the office, including the normal hours per day, time of day, and days of the week;

**ANSWER:** Representatives only spend enough time in the office to check the payment box and to check the office phone for voicemails. The times vary for when a representative is physically in the office.

i. State whether Cunningham District's representative utilizes the office for meeting with customers.

**ANSWER:** Very rarely is a meeting with customers required for Cunningham Water District. However, if need be, the office would be the suggested meeting place. Normally, any questions or concerns from customers are addressed over the phone.

2. Provide the following information for the cellular telephone number used by Cunningham District:

a. State the name and position of the contact person or persons for Cunningham District;

**ANSWER:** The cellular phone number used by Cunningham Water District belongs to Eric Young, the operator for the system.

b. State whether the contact person at the cellular telephone number has the authority to negotiate and accept partial payment plans;

**ANSWER:** Eric Young does have the authority to implement partial payment plans.

c. State whether the contact person at the cellular telephone number is trained and sufficiently knowledgeable of Cunningham District's operations to answer questions and resolve disputes; and

**ANSWER:** Eric Young is knowledgeable of Cunningham Water District's operations and is able to answer questions and resolve disputes.

d. State whether the contact person at the cellular telephone number is knowledgeable of KRS 278.160(2); KRS 278.225 regarding customer bills and service; 807 KAR 5:001, Section 20; and 807 KAR 5:006.

**ANSWER:** Eric Young is a licensed and trained Water Treatment Operator and is familiar with regulations.

3. Provide a detailed breakdown of Cunningham District's estimated annual cost of \$4,000 to \$5,000 to hire a new employee to staff its office during office hours.

**ANSWER:** In order for Cunningham Water District to hire an employee to be in the office for seven hours a day once a week, it would cost the system approximately \$4000-\$5000 annually. This cost would include wages of the employee. \$11.00 an hour for 7 hours is \$77 per day. \$77 a week for 52 weeks would be an extra \$4004 cost to the system annually, before withholdings. Cunningham Water District would have to match the employee's withholdings, which would add an extra \$305.10, totaling \$4309.10.

CARLISLE COUNTY ATTORNEY



MICHAEL W. HOGANCAMP  
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PO Box 249  
Bardwell, KY 42023  
270-628-3668

#### VERIFICATION

Eric Young states that he has read the foregoing Answers to Commission Staff's First Request for Information to Cunningham Water District and the facts contained therein are true to the best of his knowledge and belief.


  
ERIC YOUNG

Case No. 2016-00422

STATE OF KENTUCKY  
COUNTY OF CARLISLE

SUBSCRIBED and sworn to before me by ERIC YOUNG, this 24<sup>th</sup> day of May, 2017.

My Commission Expires:  
9-13-19

  
\_\_\_\_\_  
NOTARY PUBLIC

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Answer has been mailed to the following:

Talina R. Mathews  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

This the 26 day of May, 2017.

  
\_\_\_\_\_  
MICHAEL W. HOGAN  
CARLISLE COUNTY ATTORNEY