

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BRANDON AND TABITHA SWAFFORD)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2019-00457
NORTH MANCHESTER WATER ASSOCIATION,)	
INC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO NORTH MANCHESTER WATER ASSOCIATION

North Manchester Water Association (North Manchester Water), pursuant to 807 KAR 5:001, is to file with the Commission the following information on or before October 30, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, North Manchester Water shall file its response by electronic mail at psced@ky.gov. North Manchester Water SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

copies within 30 days of the lifting of the current state of emergency.² All responses in paper medium 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.

North Manchester Water shall make timely amendment to any prior response if North Manchester Water obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which North Manchester Water fails or refuses to furnish all or part of the requested information, North Manchester Water 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 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, North Manchester Water shall, in

² Any electronic email filed in this matter should be sent to PSCED@ky.gov, and each message should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Commission regulation 807 KAR 5:066, Section 5(3), and North Manchester Water's Tariff Sheet No. 31(Y)(2), which require North Manchester Water to conduct an annual survey of pressures in its distribution system. Provide a copy of the 2018 and 2019 pressure surveys. If none exist, explain why the pressure surveys were not conducted.

2. Refer to Commission regulation 807 KAR 5:006, Section 10, which sets forth requirements for addressing customer complaints.

a. State whether North Manchester Water keeps a record of all written complaints regarding water service.

b. If North Manchester Water keeps a record of written complaints, provide a copy of all complaints filed by the Swaffords and a copy of all complaints about low water pressure received by the utility since January 2018.

c. If North Manchester Water does not keep a record of written complaints, explain in specific detail why it does not.

d. State whether North Manchester Water informs customers who make a written, in-person, or telephonic complaint that is not resolved that they have a right to file a complaint with the Commission, along with the Commission's mailing address, website address, and telephone number.

e. If North Manchester Water does not provide the information to customers, explain in specific detail why it does not.

3. Provide a schedule identifying the location and date of water main breaks in North Manchester Water's system between December 2017 and October 2, 2020.
4. Provide a copy of service work orders regarding low water pressure in 2018, 2019, and year-to-date 2020.
5. Provide the name and contact information of the auditor conducting North Manchester Water's 2018 audit.
6. Provide a copy of the most recent audit of North Manchester Water.
7. Refer to the hearing testimony of Michael K. Maggard regarding the water pressure measurement taken at the Swaffords' two residential meters and two nearby homes in January 2020. Provide a copy of the water pressure measurement and any additional documentation that identifies the addresses of the two nearby homes for which Mr. Maggard conducted water pressure measurements.
8. Provide documentation regarding the \$1,684,825³ loan from Kentucky Infrastructure Association that evidences the date, amount, and term of the loan.

³ *Annual Report of North Manchester Water Association, Inc. to the Public Service Commission of the Commonwealth of Kentucky for the Calendar Year Ended December 31, 2011* at 39.



Kent A. Chandler
Acting Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED SEP 30 2020

cc: Parties of Record

Case No. 2019-00457

*North Manchester Water Association, Inc.
7362 N Highway 421
Manchester, KY 40962

*Steve Davis
President
North Manchester Water Association, Inc.
7362 N Highway 421
Manchester, KY 40962

*Raleigh P. Shepherd
Attorney at Law
305 Main Street
Manchester, KENTUCKY 40962

*Tabitha Swafford
2885 Upper Rader Road
Manchester, KENTUCKY 40962

*Brandon Swafford
2885 Upper Rader Road
Manchester, KENTUCKY 40962