

RECEIVED

FEB 26 2020

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2019-00373

In the Matter of:

NEEDHAM BETZ THOROUGHBREDS, INC.

COMPLAINANT

v.

KENTUCKY AMERICAN WATER COMPANY

DEFENDANT

**RESPONSE OF NEEDHAM BETZ THOROUGHBREDS, INC.
TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

Comes the Complainant, Needham Betz Thoroughbreds, Inc. (Needham Betz Thoroughbreds) and for its Response to the Commission Staff's First Request for Information, states as follows:

1. Provide copies of all documentation concerning Needham Betz Thoroughbreds construction of the well in 2015. Be sure to include all permit approvals from local or state governmental agencies if applicable.

RESPONSE: All documents responsive to this request are being produced with these responses.

2. Explain whether Needham Betz Thoroughbreds performs leak detection on the customer-owned portion of its water service line, and whether leaks in its service line have ever been detected.
 - a. If so, provide when the leaks were found.

- b. If leaks were found, state whether Needham Betz Thoroughbreds contacted Kentucky-American with regard to the leaks, the date the contact was made, and all correspondences regarding the same.

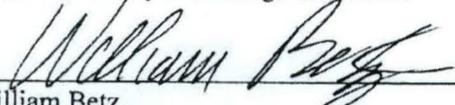
RESPONSE: Needham Betz Thoroughbreds regularly inspects its waterers and fields for leaks on a daily basis. In addition, all water lines are inspected weekly and, if any standing water is observed at any location, further investigation is conducted. From 2015 to the present date, Needham Betz Thoroughbreds has not observed any leaks in the customer-owned portion of its water service lines.

3. Refer to Needham Betz Thoroughbred's Complaint, unnumbered page 3, paragraph 2, in which it was stated that the, "well was equipped at that time with a separation system so that the system could be switched to KAW supplied service in the event of a marked decrease in water quality from the well."
 - a. Explain in full detail what is meant by a separation system.
 - b. Explain what is meant by the well was equipped "at that time" with a separation system.
 - c. State whether a separation system is currently still in place.

RESPONSE: Attached to these Responses is a statement dated February 18, 2020 from Neal Brothers Plumbing, Inc. which explains the system which was installed at the time the well was constructed and that the system was installed at the request of the Defendant Kentucky-America Water Company. Complainant adopts this statement by reference in response to this request.

VERIFICATION

I hereby certify that the foregoing Responses to Commission Staff's First Request for Information are true, complete, and accurate to the best of my knowledge and belief.

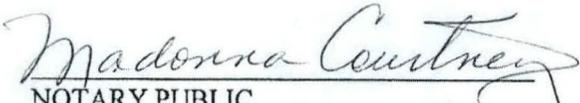


William Betz
President of Needham Betz Thoroughbreds, Inc.

STATE OF KENTUCKY
COUNTY OF FAYETTE

Sworn to and subscribed before me, a notary public, by William Betz, President of Needham Bets Thoroughbreds, Inc., on behalf of Needham Betz Thoroughbreds, Inc., on this 24th day of February 2020.

July 9, 2020
My Commission Expires



NOTARY PUBLIC
Notary Number: 560059

Respectfully submitted,



MICHAEL D. MEUSER
MILLER, GRIFFIN & MARKS, P.S.C.
271 West Short Street, Suite 600
Lexington, Kentucky 40507-1292
Telephone: (859) 255-6676
Facsimile: (859) 259-1562
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that the foregoing was served on the following, on this the 27th of February, 2020 via U.S. mail, postage pre-paid:

Public Service Commission
215 Sower Blvd.
P.O. Box 615
Frankfort, Ky 40602-06156



MICHAEL D. MEUSER
ATTORNEYS FOR PLAINTIFF

Neal Brothers Plumbing, Inc.



February 18, 2020

Re: Needham/Betz Thoroughbred Farm

To Whom It May Concern,

Neal Brothers Plumbing, Inc. installed a backflow preventer when we installed the well in 2015. The water company, KAWC, asked that the farm be able to disconnect the backflow preventer when the system was not in use. So, we installed the backflow with unions so it could be taken apart, a separator system. This system is currently still in place.

Joe D. Neal
President
Neal Brothers Plumbing, Inc.

JDN/dan



COMMONWEALTH OF KENTUCKY
 PUBLIC PROTECTION CABINET
 DEPARTMENT OF HOUSING, BUILDINGS, AND CONSTRUCTION
 Division of Plumbing
 500 Mero St., 1st Floor
 Frankfort KY, 40601-1987
 Phone: (502)573-0397, Fax: (502)573-1053

Plumbing Permit

PERMIT # [REDACTED]
ALTERNATE PERMIT #
STATUS Completed
APPLICATION DATE 06/27/2019

PROJECT DESCRIPTION		COUNTY Fayette	
PROJECT ADDRESS 4001 MT. HOREB PK, LEXINGTON, KY 40511-9585			
SUBDIVISION			
OWNER BETZ THOROUGHbred, BILL BETZ		PHONE # (859) 621-4508	
MAILING ADDRESS 4001 MT. HOREB PK, LEXINGTON, KY 40511-9585		MOBILE #	
		EMAIL	
CONTRACTOR Neal Brothers Plumbing Inc, Joseph D Neal		LICENSE # [REDACTED]	
MAILING ADDRESS 141-C Eisenhower Court, Nicholasville, KY 40356-9166		PHONE # (859) 913-0034	
HOMEOWNER CLAIMING EXEMPTION FROM LICENSURE:		EMAIL [REDACTED]	
APPLICANT Joseph D Neal		PHONE # [REDACTED]	
MAILING ADDRESS 141 Eisenhower Court Suite C, Nicholasville, KY 40356		MOBILE #	
		EMAIL	
PERMIT TYPE:	PERMIT CATEGORY:		
RESIDENTIAL <input checked="" type="checkbox"/>	<input type="checkbox"/> New Construction	<input checked="" type="checkbox"/> Existing Unit	<input type="checkbox"/> Single Family Unit <input type="checkbox"/> Multi-Family Unit
COMMERCIAL <input type="checkbox"/>	<input type="checkbox"/> Manufactured Home	<input type="checkbox"/> Modular	<input type="checkbox"/> Farmstead Exemption N/A <input type="checkbox"/> Water Heater Replacement
	<input checked="" type="checkbox"/> Back Flow Preventer	<input type="checkbox"/> Sewer Service	<input type="checkbox"/> Water Service <input type="checkbox"/> Sewer and Water Service Only
	<input type="checkbox"/> Lawn Irrigation	<input type="checkbox"/> Mobile Home Park	<input type="checkbox"/> Other
PERMIT INFORMATION:			
Type of Water Supply	Type of Sewage	Plan #	Case #
		Multi Family Units	Sewage Number
Water Closets	Sinks	Laundry Trays	Roof Drains
Bath Tubs	Service Sinks	Floor Drains	Open Receptacles
Lavatories	Drinking Fountains	Sewage Ejector Pumps	Water Services
Showers	Dishwashers	Sand Traps	House Sewers
Urinals	Special Fixture	Automatic Washers	Water Heaters
Interior Grease Trap	Mobile Home Park Units	Back Flow Preventer Units	1
COMMENTS:			
WATER-NO SEWER-NO 1" RPZ BACKFLOW PREVENTER ONLY			
FEES:		PAYMENTS:	
Fee	Amount	Date	Check #
PLB Plumbing Permit Fee	\$45.00	06/27/2019	619
			3580/41532754
Total Fees:	\$45.00		
		Payment #	Conf # Payer
		619	NEAL BROTHERS
		3580/41532754	PLUMBING, INC
		Amount	Applied
		\$45.00	\$45.00
		Total Payments:	\$45.00
Payment Memo: Processed through EPay, Payment Type: ACH, Payment Amount: \$45.00 (Transaction Amount: \$45.00, Processing Fee: \$0.00)			
The Department of Housing, Buildings and Construction, Division of Plumbing, is issuing this plumbing construction permit upon your request in accordance with KRS 318:134 and 815 KAR 20:150. You are fully aware that you are responsible for this installation in its entirety through completion. It is your responsibility to notify, request and obtain all required inspections. If for any reason you fail to complete this installation, it shall be your responsibility to notify the Department immediately.			
APPLICATION ISSUED BY:		APPLICATION DATE:	
Kentucky State Portal		06/27/2019	
		RESPONSIBLE INSPECTOR:	
		Daniel Clem	



Hodge & Hodge Inc.
 2543 Pinehard Pike
 Versailles, Ky 40383

for
 Winter Farm
 ch# 1355

Contractors Invoice

WORK PERFORMED AT:

TO: Bill Betz Thorabreds
 4001 MT Horeb
 Lexington Ky

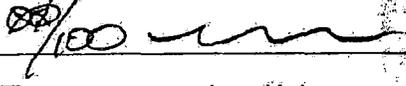
INSTALL electric service
 to pump house.

DATE: 9/2/14 YOUR WORK ORDER NO. OUR BID NO.

DESCRIPTION OF WORK PERFORMED

2	1 1/2" male ADO	Pump house
2	1 1/2" male couplings	
2	1 1/2" lock nuts	
1	15 amp single pole breaker	
1	20 " " " "	
1	15 amp 2 pole breaker	
1	30 amp 2 pole breaker	
1	100 amp 12 cir home line panel	
1036'	#6 T.W.A.N	
119'	#10 T.W.A.N	
33'	1/2" liquid tight flex	
10	1/2" " " straight conn.	
1	1 1/2" L.B.	
1	1" L.B.	
2	1" male's	
2	1" lock nuts	
2	4' pvc fixture	
2	4' pvc tubes	
1	1500 watt wall heater	
1	2 gang w.p. box	
1	20 amp g.f.c.i	
1	single pole sw	
20 hrs @	65.00	
	Total Material	1250.00
		1430.00

All Material is guaranteed to be as specified; and the above work was performed in accordance with the drawings and specifications provided for the above work and was completed in a substantial workmanlike manner for the agreed sum of **two thousand six hundred**

eight ~~00~~ /100  Dollars (\$ **2680.00**)

is a Partial Full invoice due and payable by: _____ Month _____ Day _____ Year

in accordance with our Agreement Proposal No. _____ Dated _____ Month _____ Day _____ Year

NEAL BROTHERS PLUMBING

141 Eisenhower Ct
Nicholasville, KY 40356 US
(859) 885-7650
nealbros2@aol.com

BILL TO
BETZ THOROUGHBREDS
4001 MT. HOREB PIKE
LEXINGTON, KY 40511

INVOICE 215567

DATE 09/15/2014 TERMS due upon receipt

SHIP DATE
09/15/2014

DESCRIPTION	QTY	RATE	AMOUNT
JOB: WELL-PUMP			0.00
			0.00
INSTALL WELL-PUMP			0.00
RUN 381 FT. OF WATER LINE			0.00
RUN 201 FT. OF CONDUIT			0.00
MAKE 2 BORES			0.00
MAKE 1 TIE-IN			0.00
			0.00
CONTRACT AMOUNT	1	9,200.00	9,200.00
		PAYMENT	9,200.00
		TOTAL DUE	\$0.00

PAID

NEAL BROTHERS PLUMBING
 141 Eisenhower Ct
 Nicholasville, KY 40356 US
 (859) 885-7650
 nealbros2@aol.com

BILL TO
 BETZ THOROUGHBREDS
 4001 MT. HOREB PIKE
 LEXINGTON, KY 40511

INVOICE 216206

DATE 01/29/2015 **TERMS** due upon receipt

SHIP DATE
 01/29/2015

DESCRIPTION	QTY	RATE	AMOUNT
JOB: CHECK FOR LEAK			0.00
			0.00
HOURS LABOR. FOUND METER & IT WAS SPINNING S THERE IS DEFINITELY A LEAK. DUG UP WATER MAIN, INSTALLED A 1" BACKFLOW DEVICE, BACKFILLED AND COVERED BACKFLOW PREVENTER.	8	95.00	760.00
			0.00
MATERIALS:	1	771.63	771.63
		PAYMENT	1,531.63
TOTAL DUE			\$0.00

PAID

NEAL BROTHERS PLUMBING

141 Eisenhower Ct
Nicholasville, KY 40356 US
(859) 885-7650
nealbros2@aol.com

BILL TO

BETZ THOROUGHBREDS
4001 MT. HOREB PIKE
LEXINGTON, KY 40511

INVOICE 215723

DATE 10/28/2014 TERMS due upon receipt

SHIP DATE

10/23/2014

DESCRIPTION	QTY	RATE	AMOUNT
JOB: UV LIGHTS			0.00
			0.00
HOURS LABOR. INSTALLED UV LIGHTS IN PUMP HOUSE	7	95.00	665.00
			0.00
MATERIALS:	1	1,552.33	1,552.33
			0.00
HOURS LABOR. INSTALLED WIRE CLAMP IN CONTROL BOX - NO CHARGE	0	95.00	0.00

PAYMENT 2,217.33

TOTAL DUE \$0.00

PAID

NEAL BROTHERS PLUMBING
 141 Eisenhower Ct
 Nicholasville, KY 40356 US
 (859) 885-7650
 nealbros2@aol.com

BILL TO
 BETZ THOROUGHBREDS
 4001 MT. HOREB PIKE
 LEXINGTON, KY 40511

INVOICE 215903

DATE 12/06/2014 TERMS due upon receipt

SHIP DATE
 12/06/2014

DESCRIPTION	QTY	RATE	AMOUNT
JOB: INSTALL HOSE BIBB			0.00
			0.00
HOURS LABOR. SADDLED 2" LINE IN PUMP HOUSE FOR HOSE BIBB SO WATER CAN BE CHECKED AFTER UV LIGHTS WERE INSTALLED	2	95.00	190.00
			0.00
MATERIALS:	1	50.51	50.51
		PAYMENT	240.51
TOTAL DUE			\$0.00

PAID

NEAL BROTHERS PLUMBING
 141 Eisenhower Ct
 Nicholasville, KY 40356 US
 (859) 885-7650
 nealbros2@aol.com

BILL TO
 BETZ THOROUGHBREDS
 4001 MT. HOREB PIKE
 LEXINGTON, KY 40511

INVOICE 216796

DATE 05/14/2015 **TERMS** due upon receipt

SHIP DATE
 05/14/2015

DESCRIPTION	QTY	RATE	AMOUNT
JOB: WELL PUMP			0.00
			0.00
HOURS LABOR. INSTALLED A 0-300 LBS. PRESSURE SENSOR AND FOUND WE NEED A PRESSURE RELIEF VALVE	1	95.00	95.00
			0.00
MATERIALS:	1	261.93	261.93
			0.00
HOURS LABOR. INSTALLED THE PRESSURE RELIEF VALVE ON THE PUMP LINE THEN TURNED PRESSURE ON PUMP UP TO 95 LBS.	3.50	95.00	332.50
			0.00
MATERIALS:	1	117.31	117.31
		PAYMENT	806.74
TOTAL DUE			\$0.00

PAID