



**RALEIGH P. SHEPHERD**  
ATTORNEY AT LAW  
305 MAIN STREET  
MANCHESTER, KENTUCKY 40962

RECEIVED

JAN 16 2020

PUBLIC SERVICE  
COMMISSION

TELEPHONE: (606) 599-0311

FAX: (606) 599-0344

January 13, 2020

Kentucky Public Service Commission (PSC)  
Post Office Box 615  
211 Sower Boulevard  
Frankfort, KY 40602-0615

**Re: Filing of Response of NMWA to Commission Staff's Order Entered January 2, 2020  
Case No. 2019-00457**

To Whom It May Concern:

Attached please find the Notice of Filing of Response of NMWA to Commission Staff's Order entered January 2, 2020.

Sincerely,

A handwritten signature in blue ink that reads "Raleigh P. Shepherd". The signature is fluid and cursive.

Raleigh P. Shepherd, Esq.

RPS/es

RECEIVED

JAN 16 2020

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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**RESPONSE OF NORTH MANCHESTER WATER ASSOCIATION (NMWA) TO  
ORDER DATED JANUARY 2, 2020**

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Comes NMWA, by and through its legal counsel, and pursuant to the Commission's Order dated January 2, 2020, and for its response states as follows:

On January 7, 2020, Michael K. Maggard, Project Engineer of Sisler-Maggard Engineering, PLLC, responded to a complaint made by Brandon and Tabitha Swafford which was addressed at the regular board meeting of the NMWA on January 6, 2020.

Mr. Maggard, the project engineer, went to the site accompanied by Mike Baker, the Water Superintendent, and recorded the water pressure at the aforementioned water meter. At that time, the water pressure at the site was observed to be 20 psi. Superintendent Baker left a 24 hour recorder at the site.

After review of the hydraulics and water tank overflows, the engineer concluded that 20 psi at the water meter is most likely the best pressure to be attained at that site due to the elevation at the meter.

The project engineer recommended that NMWA install a separate 2" water line

approximately 700 linear feet with a duplex water booster station to be operated and maintained by the NMWA. This will boost the pressure to over 40 psi at the meter. The project engineer discussed his recommendations with the Kentucky Division of Water and it concurred with his proposed recommendations given the circumstances.

ALL on this 14<sup>th</sup> day of January, 2020.

Respectfully Submitted,



RALEIGH P. SHEPHERD  
ATTORNEY AT LAW  
305 MAIN STREET  
MANCHESTER, KENTUCKY 40962  
TELEPHONE: (606) 599-0311  
FACSIMILE: (606) 599-0344  
E-MAIL: [shepherdlawoffice@icloud.com](mailto:shepherdlawoffice@icloud.com)  
ATTORNEY FOR NMWA

CERTIFICATE OF SERVICE

I hereby certify and attest that on this 14<sup>th</sup> day of JANUARY, 2020, a true and accurate copy of the foregoing response was served via first class mail to:

Brandon and Tabitha Swafford  
2885 Upper Rader Road  
Manchester, KY 40962

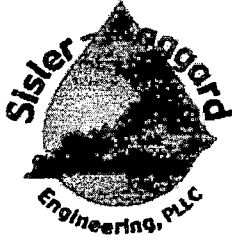
Steve Davis, President of NMWA  
7362 North Highway 421  
Manchester, KY 40962

and by filing the original with:

Kentucky Public Service Commission (PSC)  
Post Office Box 615  
211 Sower Boulevard  
Frankfort, KY 40602-0615



RALEIGH P. SHEPHERD, ESQ.



**SISLER-MAGGARD ENGINEERING, PLLC**

220 EAST REYNOLDS ROAD, SUITE A3

LEXINGTON, KY 40517

(859) 271-2978

Fax (859) 271-5670

Email: [sme@sislermaggard.com](mailto:sme@sislermaggard.com)

January 13, 2020

North Manchester Water Association  
7361 North Highway 421  
Manchester, KY 40962

**Attn: Steve Davis, President**

RE: Swafford PSC complaint – PSC Case # 2019-00457  
Upper Rader Road  
SME # 20002

Dear Mr. Davis:

After the regular board meeting on January 6, 2020, I responded to the PSC order about the Swafford complaint on Upper Rader Road.

The next day I went to the site with your water superintendent, Mike Baker and recorded the water pressure at the aforementioned water meter. It was observed at that time to be 20 psi. Mr. Baker then left a 24 hour recorder.

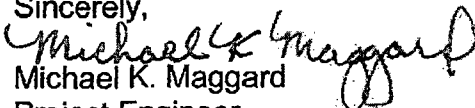
After review of the hydraulics and water tank overflows, it has been determined that 20 psi at the water meter is most likely the most that it will be due to the elevation at the meter.

The meter elevation is approximately 1160' msl and the overflow of the Bray Creek water tank is approximately 1217' msl. Therefore  $1217 - 1160 = 57' / 2.31 = 24$  psi with the tower completely full.

Therefore, I am recommending that the North Manchester Water Association install a separate 2" water line approximately 700 linear feet with a duplex water booster station to be operated and maintained by the NMWA. This will boost the pressure to over 40 psi at the meter. I have discussed the recommendation with the KY Division of Water and they concur with the proposal given the circumstances.

If you have any questions, please call.

Sincerely,

  
Michael K. Maggard

Project Engineer

Enclosures