COMMONWEALTH OF KENTUCKY CASE NO.: 2019-00457 **BEFORE: THE PUBLIC SERVICE COMMISSION**

BRANDON AND TABITHA SWAFFORD.

V.

NORTH MANCHESTER WATER ASSOCIATION, INC.,

RESPONSE TO THE DEFENDANT'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

COMES the Complainants, Brandon and Tabitha Swafford, and for their response to the Defendant's Response of North Manchester Water Association (NMWA) to Commission Staff's First Request for Information to NMWA, hereby states that while the Defendant deems it appropriate to point out that the Complainants new home is located along the highest elevation in the area and that the other customers are located at a lower elevation, that meter has a pump which provides water to the new home. The tested meter (that provides water to my 75-year-old mother) for the house in question is still at the same elevation as it was several years ago. To be clear, there are two meters, two different accounts, which belong to Brandon Swafford. One meter is for the old residence, and one meter with the added pump is for the new residence. Furthermore, the elevation of the new home has nothing to do with the poor water pressure at the meter itself.

Complainants also feel the need to state that there are many other customers in the area who have complained of poor water pressure who are hoping to benefit from the installation of the new pump station. Although the Defendant states that the project will not adversely affect any other customers in the area, they failed to state any benefit that those customers would receive from it. Complainants strongly believe that the installation of the new pump station will benefit

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PUBLIC SERVICE COMMISSION

COMPLAINANT.

DEFENDANT.

many of the Defendant's customers in that area.

Respectfully submitted, th Tabitha D. Swafford 2885 Upper Rader Road Manchester, KY 40962 Telephone: (606) 596-0830 Mobile: (606) 813-5743 Tabitha Swafford1@eku.edu

CERTIFICATE OF SERVICE

I hereby certify that the above response was served to the following, on this the 19th day of

February, 2020:

ORIGINAL:

Kentucky Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, KY 40602-0615

<u>COPY</u>:

Hon. Raleigh P. Shepherd 305 Main Street Manchester, KY 40962

Tabitha D. Swafford