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

PUBLIC SERVICE
COMMISSION

BRANDON AND TABITHA SWAFFORD,

COMPLAINANTS,

V:

NORTH MANCHESTER WATER ASSOCIATION, INC.,

DEFENDANT.

**RESPONSE TO NORTH MANCHESTER WATER ASSOCIATIONS RESPONSE TO
COMMISSION ORDER DATED SEPTEMBER 8, 2020**

COME the Complainants, Brandon and Tabitha Swafford, and for their response to North Manchester Water Associations Response to Order Dated September 8, 2020, states as follows:

Complainants feel the need to point out that counsel for the Defendant has been misinformed about the length of time it has been since complaints were made to the Defendant about the water pressure at their old residence, or at the "old" meter which is the meter in question where the undersigned's mother currently resides.

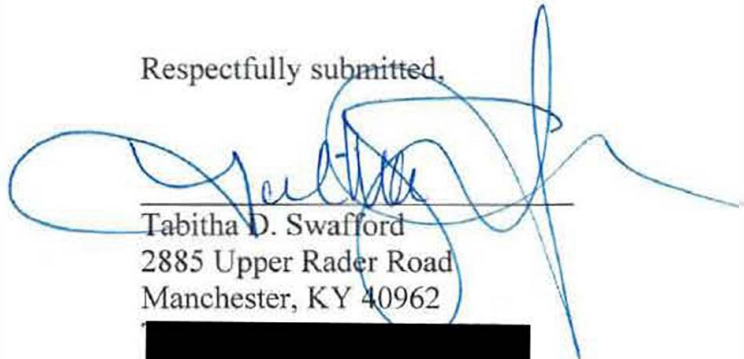
In their response, Defendant states that, "It is important to note that the complainants formerly resided in the mobile home now occupied by Mrs. Swafford's elderly mother located at 2885 Upper Rader Road in Manchester, Kentucky, prior to building their new home which is at a higher elevation than the NMWA tanks. Further, the complainants never contacted NMWA or attended a board meeting to discuss whether NMWA could provide adequate water pressure to the new construction and the mobile home prior to the new home being built even with the installation of the additional pump. There was no issue with water pressure at the mobile home prior to the construction of complainants' new home. In fact, the NMW A board agreed to pay \$500 toward a pump for the complainants' new home so it would have the required 30 psi water pressure. NMWA

maintains that the pump going to complainants' home is pulling pressure away from the mother-in-law's mobile home.”


In response, Complainants state that construction of their new home began in March of 2019. Complaints had been made to the Defendant regarding the water pressure as early as February of 2018. That winter, a pipe had burst leaving everyone in that area without water for at least a week. Once the problem was “fixed”, Complainants had little to no pressure since then. Complaints were made for a very long time before Complainants finally realized that they were getting nowhere with the Defendant and made the complaint before this Honorable Commission. There have been pressure issues in this area since February of 2018 and the complainants are not the only residents who have suffered from it.

Furthermore, Complainants would also point out that although the Defendant agreed to pay \$500.00 toward a new pump after the new meter was installed, the cost of the actual pump, fixtures, tank, and installation far exceeded that amount. The total cost was nearly \$2,000.00 and the Complainants were required to pay anything over the \$500.00 given by the Defendant. Receipts can be provided upon request.

Respectfully submitted,



Tabitha D. Swafford
2885 Upper Rader Road
Manchester, KY 40962



CERTIFICATE OF SERVICE

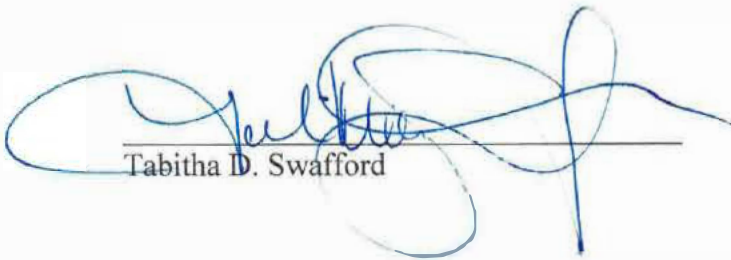
I hereby certify that the above response was served to the following, on this the 18th day of
September, 2020:

ORIGINAL:

Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602-0615
VIA E-MAIL: PSCED@ky.gov

COPY:

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



Tabitha D. Swafford