

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

LAWRENCE J. WOLTER)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2020-00080
)	
JONATHAN CREEK WATER DISTRICT)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO JONATHAN CREEK WATER DISTRICT

Jonathan Creek Water District (Jonathan Creek District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due within ten days of the date of this request. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Jonathan Creek District SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper 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. Electronic documents shall be in

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.

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.

portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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.

Jonathan Creek District shall make timely amendment to any prior response if Jonathan Creek District 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 Jonathan Creek District fails or refuses to furnish all or part of the requested information, Jonathan Creek District 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, Jonathan Creek District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide the exact dates that the meter at issue was read.
2. Provide the date that David Lovett, superintendent (Mr. Lovett) confirmed the reading.
3. Provide the date that Lawrence J. Wolter (Mr. Wolter) came into the office to sign the payment plan.
4. Confirm that the payment plan was signed on April 7, 2015.
5. Confirm that the Reading History Report shows the meter was read on February 19, 2015, March 20, 2015, and May 20, 2015.
6. Confirm that the calls between Mr. Wolter and the utility occurred between the March 20, 2015 and April 20, 2015 readings.
7. Confirm whether the payment plan was based off of a reading from March 26, 2015.
8. Explain why the meter was read on March 26, 2015.
9. Explain whether the reading for April 20, 2015, confirmed the reading taken on March 26, 2015.
10. Refer to Jonathan Creek District's response filed on June 3, 2020, third paragraph.
 - a. Explain how Mr. Wolter was notified by Jonathan Creek District of its findings.
 - b. Provide any documentation on how Mr. Wolter was notified.
11. Explain whether there has been any further contact between Mr. Wolter and Jonathan Creek District or Mr. Lovett since the letter of February 19, 2020.

- a. If there has been contact, provide how the contact was made and who made the contact.
- b. Provide any documentation concerning any contact between the two parties.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED FEB 18 2021

cc: Parties of Record

*Honorable Robert L. Prince
Attorney at Law
Prince & Brien, P.S.C.
P. O. Box 466
Benton, KENTUCKY 42025-0466

*Jonathan Creek Water District
7564 U. S. Highway 68E
P. O. Box 414
Benton, KY 42025

*Jonathan Creek Water District
Jonathan Creek Water District
7564 U. S. Highway 68E
P. O. Box 414
Benton, KY 42025

*Kip C. Mathis
Attorney
Johnson & Mathis Attorney at Law
1114 Main Street
P.O. Box 450
Benton, KENTUCKY 42025