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MAR 13 2020

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ROBERT D. HOBDY

COMPLAINANT

CASE NO. 2020-00033

v.

KENTUCKY-AMERICAN WATER COMPANY

DEFENDANT

IN REPLY TO COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION

TO ROBERT D. HOBDY

1. Explain the basis for the assertion that there are no water leaks on the rental property. Include a description of all actions taken in checking for a water leak and copies of any written documents that support the assertion.

My basis for the assertion that there are no leaks on the property is that I was present on the property daily from November 1, 2019 until December 13, 2019. During this time I was performing routine maintenance, preparing the unit for rental and showing the unit to prospective tenants. I observed that there was no leak in the service line leading from the street to the property. I have had this service line replaced in the past due to failure and am aware that a leak of this kind is similar to Old Faithful the geyser at Yellowstone. Inside the property the only fixtures are the kitchen sink, bathtub and bathroom sink. I visually confirmed that these were not leaking on a daily basis. I also did not hear any signs of water running which is very easy to detect. I have a sump pump in the crawl space to eliminate water from the crawl space during a heavy rainfall. It did not run during my time at the unit which it would have done if 27,000 gallons had escaped the water line which runs down the center of the two units in the property. In addition I was in the crawl space periodically during the period in question performing electrical work and closing vents and observed that the center of the crawl space was dry under the water lines. The outside faucet was disabled due to the removal of the handle and water

which might have come from this area would have migrated into the crawl space, however this possible outside source was not turned on. In addition to the above facts I would like the commission to be aware that I have owned the property in question since March 12 ,1986. I have performed the majority of the maintenance on this property since this time and am very familiar with the property. I would be aware of a leak of this magnitude which increased my use from 748 gallons in one period to 27,000 gallons in the following period of billing (Reference attached bills from KAWC in original complaint filing)

THIS IS A TRUE AND COMPLETE ANSWER TO THE COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED MARCH 12, 2020



Robert D. Hobby

Complainant

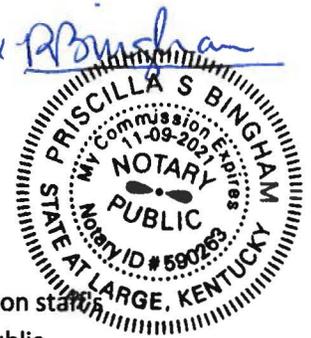
Case 2020-00033

603 Ivy Ct

Lexington KY 40505

notary public, KY State at Large Priscilla Bingham x RBingham  
march 13, 2020

CERTIFICATE OF SERVICE



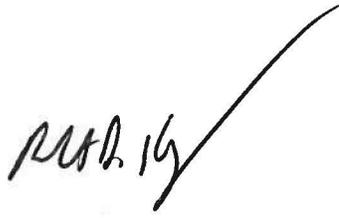
This is to certify that the original and two copies of the forgoing answer to the commission staff's initial request for information have been filed on this 13th day of March, 2020, at the Public Service Commission and that a true and accurate copy has been served via U.S. Mail on the same day to the following:

Lindsey W. Ingram III

STOLL KEENON OGDEN PLLC

300 West Vine Street, Suite 2100

Lexington, KY 40507

A handwritten signature in black ink, appearing to read "R. H. 16", with a long, sweeping flourish extending upwards and to the right.

Complainant