

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KIRKSVILLE WATER ASSOCIATION, INC. AND)	
ITS INDIVIDUAL DIRECTORS, ARMON)	
SANDERS, WAYNE LONG, ALFRED WINKLER,)	CASE NO.
RANDAL WEBB, AND BOBBY POWELL, AND)	2022-00197
MANAGER MIKE AGEE ALLEGED FAILURE TO)	
COMPLY WITH KRS 278.300 AND KRS 278.020)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO KIRKSVILLE WATER ASSOCIATION, INC.

Kirksville Water Association, Inc. (Kirksville Water), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on November 7, 2022. The Commission directs Kirksville Water to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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.

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

1. Reference the contract for services filed on September 26, 2022, in response to Commission Staff's First Request for Information (Staff's First Request). Provide any written documentation detailing the reasons that Madison County Utilities District and Kirksville Water terminated the agreement.

2. Reference the contract for services filed on September 26, 2022, in response to Staff's First Request for Information. Provide any written agreement between

Madison County Utilities District and Kirksville Water for contractual services prior to 2017.

3. Provide any written legal opinion relied upon by Kirksville Water prior to obtaining financing for 1615 Foxhaven Dr., Richmond, Kentucky, as it relates to financing or regulatory approvals.

4. Provide the invoices, receipts, and all other documentation for the improvements and modifications made to 1615 Foxhaven Dr., Richmond, Kentucky.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED OCT 20 2022

cc: Parties of Record

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