



**DAMON R. TALLEY**  
PH: 270-358-3187  
FAX: 270-358-9560  
damon.talley@skofirm.com

PO Box 150  
112 N. LINCOLN BLVD.  
HODGENVILLE, KY 42748

November 25, 2024

Ms. Linda C. Bridwell, P.E.  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

**RECEIVED**

NOV 25 2024

PUBLIC SERVICE  
COMMISSION

**Re: Farmdale Water District  
2023-00148**

Dear Ms. Bridwell:

Enclosed for filing please find Farmdale Water District's Response to Staff's First Request for Information in the above-referenced matter.

Respectfully,

  
Damon R. Talley

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>JOHN C. LAWRENCE</b>	)	
	)	
<b>COMPLAINANT</b>	)	
	)	<b>CASE NO.</b>
<b>V.</b>	)	<b>2023-00148</b>
	)	
<b>FARMDALE WATER DISTRICT</b>	)	
	)	
<b>DEFENDANT</b>	)	

**RESPONSE OF**  
**FARMDALE WATER DISTRICT**  
**TO**  
**COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION**  
**DATED NOVEMBER 12, 2024**

**FILED: NOVEMBER 25 , 2024**

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>JOHN C. LAWRENCE</b>	)	
	)	
<b>COMPLAINANT</b>	)	
	)	
<b>V.</b>	)	<b>Case No.</b>
	)	<b>2023-00148</b>
<b>FARMDALE WATER DISTRICT</b>	)	
	)	
<b>DEFENDANT</b>	)	

**RESPONSE OF FARMDALE WATER DISTRICT  
TO COMMISSION STAFF'S FIRST  
REQUEST FOR INFORMATION**

Comes Farmdale Water District (the "District") for its Response to Commission Staff's First Request for Information, and states as shown on the following pages.



---

Damon R. Talley  
Tina C. Frederick  
Stoll Keenon Ogden PLLC  
300 West Vine Street, Suite 2100  
Lexington, Kentucky 40507-1801  
Telephone: (859) 231-3039  
Fax: (859) 253-1093  
[damon.talley@skofirm.com](mailto:damon.talley@skofirm.com)  
[tina.frederick@skofirm.com](mailto:tina.frederick@skofirm.com)

*Counsel for Farmdale Water District*

## **CERTIFICATE OF SERVICE**

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on November 25, 2024; and that a true and accurate copy of this filing has been sent via U. S. Mail to Mr. John Lawrence at the address provided on the Complaint.



---

Damon R. Talley

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**JOHN C. LAWRENCE**

**COMPLAINANT**

**V.**

**FARMDALE WATER DISTRICT**

**DEFENDANT**

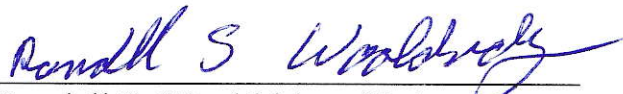
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**CASE NO.**  
**2023-00148**

**CERTIFICATION OF RESPONSE OF FARMDALE  
WATER DISTRICT TO COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION**


This is to certify that I have supervised the preparation of Farmdale Water District's Responses to Commission Staff's First Request for Information. The response submitted on behalf of Farmdale Water District is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Date: November 25, 2024



Randall S. Wooldridge, Chairman  
Farmdale Water District

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF FRANKLIN )

  
Randall S. Wooldridge, Chairman  
Farmdale Water District

  
Notary Public

Notary ID: KYNP62966

**FARMDALE WATER DISTRICT**

**CASE NO. 2023-00148**

**Response to Commission Staff's First Request for Information**

**Question No. 1**

**Responding Witness:** Randall S. Wooldridge, Chairman

**Q-1. Provide a statement from Farmdale District explaining whether the water leak(s) referenced in the Complaint were located on Mr. Lawrence's side of the meter or Farmdale District's side of the meter.**

A-1. The water leak referenced in Mr. Lawrence's complaint was on Mr. Lawrence's side of the meter. The fact that water usage was recorded by the meter is evidence that the leak was on Mr. Lawrence's side of the meter. Had the leak been on Farmdale District's side of the meter, which encompasses all waterlines before the meter and the meter itself, the water from the leak would have not been recorded by the meter.

Farmdale District offers a leak adjustment to its customers per its tariff on file with the Commission. The leak adjustment policy is set forth on Tariff Sheet No. 37.1. To avail themselves of the leak adjustment policy, customers must submit a request to Farmdale District in writing and provide evidence of a repair. Farmdale District has no record of Mr. Lawrence requesting a leak adjustment. However, should Mr. Lawrence request a leak adjustment and

provide evidence of a repair, Farmdale District's tariff supports a **\$3,280.82**

leak adjustment as shown below:

July 27, 2022 Bill Amount: **\$8,827.05**

**I. Three-month Average Usage:**

April 27, 2022 Bill 2,900 Gallons

May 26, 2022 Bill 2,600 Gallons

June 27, 2022 Bill 2,700 Gallons

$8,200/3 = \mathbf{2,700 \text{ gallons}}$  (rounded down from 2,733)

2,700 gallons billed at regular rates: **\$24.83**

**II. Deduction of Three-month Average:**

July 27, 2022 Bill 1,498,200 Gallons

Less Average ( 2,700) Gallons

1,495,500 Gallons

**III. Cost of Water in Excess of the Three-month Average Usage:**

Cost to Farmdale **\$2.84/per** 1,000 gallons

(Frankfort Plant Board Tariff Rate \$2.55/per 1,000 gallons + Kentucky River Authority withdrawal Fee \$0.29/per 1,000 gallons)

$1,495,500/1000 = 1,495.5$

$1,495.50 \times \$2.84 = \$4,247.22$

30 percent of Farmdale's cost

$\$4,247.22 \times 0.30 = \$1,274.17$

$\$4,247.22 + \$1,274.17 = \mathbf{\$5,521.39}$



**IV. Bill Adjustment:**

Adjusted Bill

\$5,521.39 Adjusted Rate for 1,495,500 gallons

\$ 24.83 Regular Rate for 2,700 gallons

**\$5,546.22** Adjusted Bill

Original Bill: \$8,827.05

Adjusted Bill \$5,546.22

**\$3,280.82 Total Leak Adjustment**

**FARMDALE WATER DISTRICT**

**CASE NO. 2023-00148**

**Response to Commission Staff's First Request for Information**

**Question No. 2**

**Responding Witness:** Randall S. Wooldridge, Chairman

**Q-2. Confirm whether Farmdale District conducted a leak test at the service address referenced in the Complaint in December 2021, including an explanation of the type of test(s), why any test(s) was conducted, and the results of any test(s).**

A-2. A thorough search of Farmdale District's work orders for 2021 did not produce any work order for leak testing or investigation at Mr. Lawrence's address at any time in 2021. None of Farmdale District's current field crew were employed by Farmdale District in December 2021. All of the Farmdale District employees who were field crew members in December 2021 have since left Farmdale District's employ and have no relationship with Farmdale District at this time. The General Manager of Farmdale District in December 2021 was Jamie Roberts, who is also no longer employed by Farmdale District. There are no field crew members who can confirm that any leak testing was done at Mr. Lawrence's address in December 2021. Therefore, Farmdale District cannot confirm through its records or through the testimony

of any employee directly involved that testing occurred at Mt. Lawrence's address in December 2021.

However, Farmdale District does not dispute any claim by Mr. Lawrence that standing water at his address was tested for chlorine in December 2021. This is because office staff members and current Chairman, Randall Wooldridge, who was a board member in December 2021, do remember field crew members and Mr. Roberts discussing testing standing water at Mr. Lawrence's address for chlorine and finding that no chlorine was present. The exact date such testing occurred cannot be established, but Farmdale District does not contest any allegation that such testing occurred, because chlorine testing of standing water would have been a logical first step in determining whether a leak was present.

Although the absence of chlorine in standing water does not conclusively prove that standing water is not a result of a leaking waterline, the *presence* of chlorine in standing water does prove that standing water is the result of a leaking waterline. This is because the chlorine levels in treated water that is exposed to sunlight and warm temperatures tend to drop, so that treated water will not always test positive for chlorine if it has been outside of the waterline for a time. Despite its limitations, testing for the presence of

chlorine is often done when a waterline leak is suspected to be the cause of unusual standing water.

**FARMDALE WATER DISTRICT**

**CASE NO. 2023-00148**

**Response to Commission Staff's First Request for Information**

**Question No. 3**

**Responding Witness:** Randall S. Wooldridge, Chairman

**Q-3. Provide a statement from Farmdale District of whether the December 2021 tests were conducted at Mr. Lawrence's request or whether Farmdale District initiated the action.**

A-3. Because no written record of any testing in December 2021 at Mr. Lawrence's address exists and no field employee from the relevant time period is available to provide direct insight into the matter, Farmdale District cannot conclusively establish that the chlorine testing, which office staff and Mr. Wooldridge recall being discussed, was done at the request of Mr. Lawrence. However, it would be extremely rare for Farmdale District to initiate such testing. This is because the standing water to be tested was on private property and not obvious to someone passing by on the roadway. Farmdale District would have had no reason, other than meter reading, to be at the location to observe any issue with mud or standing water. If Farmdale District employees observe unusual amounts of standing water along a

roadway where the district has waterlines close to the road, Farmdale District might on its own initiative test the standing water for chlorine, but in this instance where any standing water was not immediately obvious to a passerby, Farmdale District would have had no reason to initiate any testing. Farmdale District is of the belief that chlorine testing did occur and it occurred at Mr. Lawrence's request.

**FARMDALE WATER DISTRICT**

**CASE NO. 2023-00148**

**Response to Commission Staff's First Request for Information**

**Question No. 4**

**Responding Witness:** Randall S. Wooldridge, Chairman

**Q-4. Provide a list of what tests were conducted in April 2022, any test results, and an explanation why Farmdale District concluded there was not a leak.**

A-4. Farmdale District's records do not show any work orders for leak investigation or meter tests for Mr. Lawrence's address in April of 2022. Although Farmdale District does not have records to verify any allegation that chlorine testing was done on standing water at Mr. Lawrence's address, Farmdale District does not dispute any allegation that such chlorine testing was done in April 2022, and that it did not reveal the presence of chlorine in the water tested. As stated in the Response to Item 2, office staff and Chairman Wooldridge remember discussion of such testing occurring, so Farmdale District does not dispute that chlorine testing occurred.

The meter at Mr. Lawrence's address was replaced on August 12, 2022. The meter was tested on August 17, 2022, and October 19, 2022 at C.I. Thornburg/Citco Water in Bowling Green, Kentucky. The results of those

tests are attached to this response as **Attachment 1-4a**. The meter test done on August 17, 2022, showed that the meter was recording slow at high flow. The meter tested within allowable limits on October 19, 2022.

Additionally, the Commission's Division of Inspections arranged to have the meter tested by Louisville Water Company; that test occurred on December 6, 2022. Attached as **Attachment 1-4b** is the letter sent to Farmdale District following the testing by Louisville Water Company. The letter indicated that the meter tested slow on the high flow test. Farmdale District maintains that this indicates that the meter was failing to register all of the water passing through it, not registering a higher level of water than was actually passing through the meter. The letter indicates that the actual test results from Louisville Water Company were included with the letter, but Farmdale District does not have a copy of those results in its files.



# **Attachment 1-4a**

## **Meter Test Results**



# The C.I. Thornburg Co., Inc.

140B Ambassador Drive

Bowling Green, Kentucky 42101

Phone: (270)843-0852

Fax: (270)780-9894

Page:

of:

Sales Order #: S100193690

Date Tested: 8/17/2022

Tester: L.Wooldridge

Card #:

## Meter Shop Test Report

Customer: Farmdale

	Serial #	Size	Meter Mfg.	Model	% ACCURACY AS RECEIVED				% ACCURACY AS REPAIRED				Address
					High	Med.	Low	Avg.	High	Med.	Low	Avg.	
1	74958009	5/8	Sensus	lperl	99.2	100.1	99.8	99.70				#DIV/0!	Tamworth 1078
2	74957647	5/8	Sensus	lperl	98.3	100.8	100.2	99.767				#DIV/0!	Scholfield 376
3								#DIV/0!				#DIV/0!	
4								#DIV/0!				#DIV/0!	
5								#DIV/0!				#DIV/0!	
6								#DIV/0!				#DIV/0!	
7								#DIV/0!				#DIV/0!	
8								#DIV/0!				#DIV/0!	
9								#DIV/0!				#DIV/0!	
10								#DIV/0!				#DIV/0!	
11								#DIV/0!				#DIV/0!	
12								#DIV/0!				#DIV/0!	
13								#DIV/0!				#DIV/0!	
14								#DIV/0!				#DIV/0!	
15								#DIV/0!				#DIV/0!	
16								#DIV/0!				#DIV/0!	
17								#DIV/0!				#DIV/0!	
18								#DIV/0!				#DIV/0!	
19								#DIV/0!				#DIV/0!	
20								#DIV/0!				#DIV/0!	
21								#DIV/0!				#DIV/0!	



**Citco Water**  
**140B Ambassador Drive**  
**Bowling Green, Kentucky 42101**

**Phone: (270)843-0852**

**Fax: (270)780-9894**

Page:

of:

Sales Order #: S100199723

Date Tested: 10/19/2022

Tester: L.Wooldridge

Card #:

**Meter Shop Test Report**

Customer: Farmdale

"Schlofield 376"

	Serial #	Size	Meter Mfg.	Model	% ACCURACY AS RECEIVED				% ACCURACY AS REPAIRED				
					High	Med.	Low	Avg.	High	Med.	Low	Avg.	
1	74957647	5/8	Sensus	lperl	98.5	99.9	99.9	99.433				#DIV/0!	376 Schlofield
2								#DIV/0!				#DIV/0!	
3								#DIV/0!				#DIV/0!	
4								#DIV/0!				#DIV/0!	
5								#DIV/0!				#DIV/0!	
6								#DIV/0!				#DIV/0!	
7								#DIV/0!				#DIV/0!	
8								#DIV/0!				#DIV/0!	
9								#DIV/0!				#DIV/0!	
10								#DIV/0!				#DIV/0!	
11								#DIV/0!				#DIV/0!	
12								#DIV/0!				#DIV/0!	
13								#DIV/0!				#DIV/0!	
14								#DIV/0!				#DIV/0!	
15								#DIV/0!				#DIV/0!	
16								#DIV/0!				#DIV/0!	
17								#DIV/0!				#DIV/0!	
18								#DIV/0!				#DIV/0!	
19								#DIV/0!				#DIV/0!	
20								#DIV/0!				#DIV/0!	
21								#DIV/0!				#DIV/0!	

# **Attachment 1-4b**

**Letter from Division of Inspections**

*Revised*



Andy Beshear  
Governor

Rebecca W. Goodman  
Secretary  
Energy and Environment Cabinet

Commonwealth of Kentucky  
**Public Service Commission**  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, Kentucky 40602-0615  
Telephone: (502) 564-3940  
Fax: (502) 564-3460  
psc.ky.gov

Kent A. Chandler  
Chairman

Mary Pat Regan  
Commissioner

**METER STANDARDS LABORATORY  
REQUEST METER TEST REPORT  
[Pursuant to 807 KAR 5:066, Section 15(2)(a)]  
WATER**

**INFORMAL COMPLAINT #:** N/A  
**CUSTOMER:** John Lawrence  
**UTILITY:** Farmdale Water District  
**TEST DATE:** December 6<sup>th</sup>, 2022  
**TESTING FACILITY:** Louisville Water Company

**DISCUSSION:**

The Division of Inspections (DOI) received a request from the Consumer Services Branch to have John Lawrence's meter tested by Kentucky Public Service Commission (Commission) as per 807 KAR 5:006, Section 19(2).

On December 6<sup>th</sup>, 2022, Mr. Lawrence's meter was tested by Louisville Water Company, an independent third party representing the Commission. Louisville Water Company's meter test bench is located at 4801 Allmond Ave., Louisville, KY 40214. Records indicate that Mr. Lawrence's meter was first tested by C.I. Thornburg Co. Inc., (Citco) on October 10<sup>th</sup>, 2022. (see attachment A)

**FINDINGS:**

The request test was performed in accordance with 807 KAR 5:066, Section 15(2)(a) for a 5/8" x 3/4" Ultrasonic meter. The meter was tested at the minimum flow rate of 1/4 gallon per minute ("gpm"), the intermediate flow rate of 2 gpm, and the high flow rate of 15 gpm. At each flow test, the accuracy results were compared with the accuracy requirements prescribed by 807 KAR 5:066, Section 15(2)(a).

The accuracy results of this meter test were: 99 percent at the 1/4 gpm, 99 percent at the 2 gpm, and 98.2 percent at the 15 gpm.

These accuracy results indicate that the meter failed on the high flow test.

As required by 807 KAR 5:066, Section 15(4), Determination of meter error for bill adjustment purposes, when upon periodic, request, or complaint test, a meter is found

**TEAM**  
**KENTUCKY**



December 7, 2022

Page 2

to be in error in excess of the limits allowed by the commission's administrative regulations, 807 KAR 5:066 Section 15(2)(a), three additional tests of the meter shall be made: one at seventy-five percent of rated maximum capacity; one at fifty percent of rated maximum capacity; one at twenty-five percent of the rated maximum capacity. The average meter error shall be the algebraic average of the errors of the three tests.

The accuracy results of these three additional tests were: 98.2 percent at seventy-five percent of rated maximum capacity, 98 percent at fifty percent of rated maximum capacity, and 98.2 percent at the twenty-five percent of the rated maximum capacity. The algebraic average of these three tests is 98.13 percent with an average meter error of .97 percent slow.

Pursuant to 807 KAR 5:006, Section 11(2)(a), the average meter error of 1.9 percent slow is not within the two percent plus or minus accuracy guidelines for billing purposes.

**REPORT SUBMITTED BY:**

**Date: 12/7/2022**

*Taylor Stamper*

Utility Inspector  
Division of Inspections  
Kentucky Public Service Commission

Attachments:

- A. Citgo Meter Test Results
- B. Louisville Water Company's Meter Test Results

TEAM   
KENTUCKY

**FARMDALE WATER DISTRICT**

**CASE NO. 2023-00148**

**Response to Commission Staff's First Request for Information**

**Responding Witness:** Randall S. Wooldridge, Chairman

**Q-5. State whether Farmdale District read the meter in question between December 2021 and September 2022 and explain how Farmdale District read the meter in question. Actual meter readings, along with the date of the reading, should be provided for each meter reading that occurred during that time. If the meter reading was estimated, it should be noted.**

A-5. Farmdale District **did** read the meter at Mr. Lawrence's address every month from December 2021 through September 2022. Attached to this Response as **Attachment 1-5a** is a Reading History Report. The report provides the date and time of each meter reading, the actual meter readings, the usage, and the reading type. The meter was manually read each month, there are no estimated readings. Please note that the meter at Mr. Lawrence's address was replaced on August 12, 2022. The meter installation information is attached to this Response as **Attachment 1-5b**. The meter readings recorded in the Reading History Report are in increments of 100 gallons. For instance, for the meter reading that occurred on December 8, 2021, the "Previous Reading" is 12,263 and the "Present Reading" is 12,311. The difference between the previous reading and current reading is 48. This means that 4,800 gallons of water

passed through the meter between the previous reading and the December 8, 2021 reading. For the meter reading of September 7, 2022, the “Previous Reading” is “0” because a new meter was installed on August 12, 2022, and the meter began recording usage on August 12, 2022, when water began to pass through the new meter.



# **Attachment 1-5a**

## **Meter Reading History Report**

# Farmdale Water District Reading History Report

Service Type	WT WATER	Starting Date	12/01/2021
Cycle	All Cycles	Ending Date	10/01/2022
Starting Account	[REDACTED]	Sort Order	Account
Ending Account	[REDACTED]	Page Break on Account Group	<input type="checkbox"/>
Print on wide carriage	No	Use Reading Factor	Yes
Date Selection For Report	Reading		All Groups

Reading Date	Service	Rate	Meter Number	Previous Reading	Present Reading	Usage	Reading Type	Deduct Usage	Demand Usage	Change Out
[REDACTED] 01 Lawrence, John/Julia				376 Schofield Lane Frankfort, KY 40601						
12/08/2021 02:43 PM	WATER	01	74957647	12,263	12,311	4,800	Read	0	0	<input type="checkbox"/>
01/12/2022 08:30 AM	WATER	01	74957647	12,311	12,357	4,600	Read	0	0	<input type="checkbox"/>
02/07/2022 01:42 PM	WATER	01	74957647	12,357	12,397	4,000	Read	0	0	<input type="checkbox"/>
03/07/2022 01:46 PM	WATER	01	74957647	12,397	12,437	4,000	Read	0	0	<input type="checkbox"/>
04/06/2022 10:29 AM	WATER	01	74957647	12,437	12,466	2,900	Read	0	0	<input type="checkbox"/>
05/04/2022 11:08 AM	WATER	01	74957647	12,466	12,492	2,600	Read	0	0	<input type="checkbox"/>
06/06/2022 11:46 AM	WATER	01	74957647	12,492	12,519	2,700	Read	0	0	<input type="checkbox"/>
07/07/2022 01:59 PM	WATER	01	74957647	12,519	27,501	1,498,200	Read	0	0	<input type="checkbox"/>
08/02/2022 08:26 AM	WATER	01	74957647	27,501	27,600	9,900	Read	0	0	<input type="checkbox"/>
08/12/2022 12:00 AM	WATER	01	74957647	27,600	27,600	0	Read	0	0	<input checked="" type="checkbox"/>
09/07/2022 08:41 AM	WATER	01	92301958	0	61	6,100	Read	0	0	<input type="checkbox"/>
1 Customers in Route 0002				1,539,800 Route Usage						
1 Customers on Report				1,539,800 Total Usage						

\* All reads were manually read

# **Attachment 1-5b**

## **Meter Replacement**

38.13016

94.92586

Installation Information:

Address: 8/12/22

Installer: A M M

Date: 8/3/22

Old Meter ID: 89674245

Old Mtr Reading: \_\_\_\_\_

New Meter ID: ①

New Mtr Reading: \_\_\_\_\_

Register ID: \_\_\_\_\_

Other Info: CID 9230/958

**SENSUS**

WWW.SENSUS.COM

1-800-METERIT

1-800-6383748

376 Schofield

**FARMDALE WATER DISTRICT**

**CASE NO. 2023-00148**

**Response to Commission Staff's First Request for Information**

**Question No. 6**

**Responding Witness:** Randall S. Wooldridge, Chairman

**Q-6. Provide any bills Farmdale District sent to Mr. Lawrence from January 2022 to June 2022.**

A-6. Farmdale District's billing software is not capable of reproducing bills. However, Farmdale District's billing software does provide a "History Billing Register" which shows the total amount of the bill, the date of the bill, the date any late payment penalties were added, and the usage. Attached to this Response as **Attachment 1-6a** is a copy of the History Billing Register for Mr. Lawrence's address from January 27, 2022 through June 27, 2022.

Additionally, Farmdale District's billing software produces a "Customer History Report" which provides the date and amount of the bills and the date and amount of any payments. The Customer History Report for Mr. Lawrence's account for the period of January 2022 through June 2022 is attached to this Response as **Attachment 1-6b**. Some explanation

concerning the report and how to read it is in order. For example, there are three (3) lines on the report dated January 27, 2022. The first of these lines indicates a billing for water service from December 8, 2022, through January 12, 2022. The bill is \$42.85 for 4,600 gallons of water. The bill remained unpaid as of February 10, 2022, so on February 11, 2022 a late payment penalty was applied. This is seen on the line dated February 11, 2022. The bill, including the late penalty, was paid on February 17, 2022. The payment is shown on the line dated February 17, 2022. On February 25, 2022, a bill of \$38.40 for water service from January 12, 2022, through February 7, 2022, was generated. Each entry of the report is dated and indicates whether the entry is for billing of water service (“WAB”), penalty billing (“PNB”) or a payment (“PAY”).

# **Attachment 1-6a**

## **History Billing Register**

## Farmdale Water District History Billing Register

Service Type All Service Types  
 Cycle All Billing Cycles  
 Customer Type All Customer Types  
 Account Number Range XXXXXXXXXX  
 Date Range 01/01/2022 To 07/01/2022  
 Address To Print Billing  
 Report will be printed on a wide carriage printer ☐  
 Use Reading Factor ☒

Tran. Date		Service	Usage	Demand Usage	RT	Service Amount	Surcharge 1 RT	Surcharge 1 Amount	Surcharge 2 RT	Surcharge 2 Amount	Local Tax Amount	Local Tax RT	State Tax Amount	State Tax RT	Penalty Amount	Total Amount	
Account		John/Julia Lawrence				Type	R	Cycle	01	Billing Address	376 Schofield Lane Frankfort, KY 40601						
01/27/2022	WATER		4,600		0 01	\$38.77	05	\$3.00	00	\$0.00	01	\$1.16	00	\$0.00	00	\$0.00	\$42.93
02/11/2022	WATER		0		0 01	\$0.00	00	\$0.00	00	\$0.00	00	\$0.00	00	\$0.00	01	\$3.87	\$3.87
02/25/2022	WATER		4,000		0 01	\$34.37	05	\$3.00	00	\$0.00	01	\$1.03	00	\$0.00	00	\$0.00	\$38.40
03/11/2022	WATER		0		0 01	\$0.00	00	\$0.00	00	\$0.00	00	\$0.00	00	\$0.00	01	\$3.44	\$3.44
03/25/2022	WATER		4,000		0 01	\$34.37	05	\$3.00	00	\$0.00	01	\$1.03	00	\$0.00	00	\$0.00	\$38.40
04/12/2022	WATER		0		0 01	\$0.00	00	\$0.00	00	\$0.00	00	\$0.00	00	\$0.00	01	\$3.44	\$3.44
04/27/2022	WATER		2,900		0 01	\$26.30	05	\$3.00	00	\$0.00	01	\$0.79	00	\$0.00	00	\$0.00	\$30.09
05/11/2022	WATER		0		0 01	\$0.00	00	\$0.00	00	\$0.00	00	\$0.00	00	\$0.00	01	\$2.63	\$2.63
05/26/2022	WATER		2,600		0 01	\$24.09	05	\$3.00	00	\$0.00	01	\$0.72	00	\$0.00	00	\$0.00	\$27.81
06/13/2022	WATER		0		0 01	\$0.00	00	\$0.00	00	\$0.00	00	\$0.00	00	\$0.00	01	\$2.41	\$2.41
06/27/2022	WATER		2,700		0 01	\$24.83	05	\$3.00	00	\$0.00	01	\$0.74	00	\$0.00	00	\$0.00	\$28.57
Totals For Account				11 Transactions		\$182.73		\$18.00		\$0.00		\$5.47		\$0.00		\$15.79	\$221.99
Totals For Route 0002																	
WATER			20,800		0	\$182.73		\$18.00		\$0.00	00	\$5.47		\$0.00		\$15.79	\$221.99
Route 0002 Grand Totals			1 Account	Net	\$206.20	\$182.73		\$18.00		\$0.00		\$5.47		\$0.00		\$15.79	\$221.99
Report Totals																	
WATER			20,800		0	\$182.73		\$18.00		\$0.00	00	\$5.47		\$0.00		\$15.79	\$221.99
Report Grand Totals			1 Account	Net	\$206.20	\$182.73		\$18.00		\$0.00		\$5.47		\$0.00		\$15.79	\$221.99



# **Attachment 1-6b**

## **Customer History Report**

# Farmdale Water District Customer History Report

Service Type All      Use Reading Factor ☐      Print Transaction in Descending Order ☐  
 AR Code All      Start Balance With Zero ☐  
 Beginning Date 01/01/2022      Print Breakdown By ☐ Transaction ☐ Service ☒ Taxes ☐ Totals Only  
 Ending Date 07/01/2022

History For Account [REDACTED] Lawrence, John/Julia

Tran Date	Post Date	Code	Description	Service Desc	Usage	Service Local Tax	Surcharge1 State Tax	Surcharge2 Penalty	Unapplied	Balance
Void	Posted By	Check#								
01/05/22	01/05/22	PAY	Payment	WATER	01	(\$100.30)	(\$6.00)	\$0.00		
<input type="checkbox"/>	Janice				0	(\$3.01)	\$0.00	(\$6.01)	\$0.00	\$0.00
01/22/22	01/22/22	PAY	Payment	Cust Unapp Cash		\$0.00	\$0.00	\$0.00		
<input type="checkbox"/>	Janice				0	\$0.00	\$0.00	\$0.00	(\$0.08)	(\$0.08)
01/27/22	01/27/22	WAB	Water Billing	WATER	01	\$38.77	\$3.00	\$0.00		
	Janice	12/8/22 - 1/12/22			4,600	\$1.16	\$0.00	\$0.00	\$0.00	\$42.85
01/27/22	01/27/22	OVP	Apply Overpayr			\$0.00	\$0.00	\$0.00		
	Janice				0	\$0.00	\$0.00	\$0.00	\$0.08	\$42.93
01/27/22	01/27/22	OVP	Apply Overpayr	WATER	01	(\$0.08)	\$0.00	\$0.00		
	Janice				0	\$0.00	\$0.00	\$0.00	\$0.00	\$42.85
02/11/22	02/11/22	PNB	Penalty Billing	WATER	01	\$0.00	\$0.00	\$0.00		
	Janice				0	\$0.00	\$0.00	\$3.87	\$0.00	\$46.72
02/17/22	02/17/22	PAY	Payment	WATER	01	(\$38.69)	(\$3.00)	\$0.00		
<input type="checkbox"/>	Janice				0	(\$1.16)	\$0.00	(\$3.87)	\$0.00	\$0.00
02/25/22	02/25/22	WAB	Water Billing	WATER	01	\$34.37	\$3.00	\$0.00		
	Janice	1/12/22 - 2/7/22			4,000	\$1.03	\$0.00	\$0.00	\$0.00	\$38.40
03/11/22	03/11/22	PNB	Penalty Billing	WATER	01	\$0.00	\$0.00	\$0.00		
	Janice				0	\$0.00	\$0.00	\$3.44	\$0.00	\$41.84
03/24/22	03/24/22	PAY	Payment	WATER	01	(\$34.37)	(\$3.00)	\$0.00		
<input type="checkbox"/>	Janice				0	(\$1.03)	\$0.00	(\$3.44)	\$0.00	\$0.00
03/25/22	03/25/22	WAB	Water Billing	WATER	01	\$34.37	\$3.00	\$0.00		
	Janice	2/7/22 - 3/7/22			4,000	\$1.03	\$0.00	\$0.00	\$0.00	\$38.40
04/12/22	04/12/22	PNB	Penalty Billing	WATER	01	\$0.00	\$0.00	\$0.00		
	Janice				0	\$0.00	\$0.00	\$3.44	\$0.00	\$41.84
04/15/22	04/15/22	PAY	Payment	WATER	01	(\$34.37)	(\$3.00)	\$0.00		
<input type="checkbox"/>	Janice				0	(\$1.03)	\$0.00	(\$3.44)	\$0.00	\$0.00
04/27/22	04/27/22	WAB	Water Billing	WATER	01	\$26.30	\$3.00	\$0.00		
	Janice	3/7/22 - 4/6/22			2,900	\$0.79	\$0.00	\$0.00	\$0.00	\$30.09
05/11/22	05/11/22	PNB	Penalty Billing	WATER	01	\$0.00	\$0.00	\$0.00		
	Janice				0	\$0.00	\$0.00	\$2.63	\$0.00	\$32.72
05/26/22	05/26/22	WAB	Water Billing	WATER	01	\$24.09	\$3.00	\$0.00		
	Janice	4/6/22 - 5/4/22			2,600	\$0.72	\$0.00	\$0.00	\$0.00	\$60.53
06/01/22	06/01/22	PAY	Payment	WATER	01	(\$26.30)	(\$3.00)	\$0.00		
<input type="checkbox"/>	Yvonne				0	(\$0.79)	\$0.00	(\$2.63)	\$0.00	\$27.81
06/13/22	06/13/22	PNB	Penalty Billing	WATER	01	\$0.00	\$0.00	\$0.00		
	Janice				0	\$0.00	\$0.00	\$2.41	\$0.00	\$30.22
06/27/22	06/27/22	WAB	Water Billing	WATER	01	\$24.83	\$3.00	\$0.00		
	Janice	5/4/22 - 6/6/22			2,700	\$0.74	\$0.00	\$0.00	\$0.00	\$58.79

**FARMDALE WATER DISTRICT**

**CASE NO. 2023-00148**

**Response to Commission Staff's First Request for Information**

**Question No. 7**

**Responding Witness:** Randall S. Wooldridge, Chairman

**Q-7. Provide any and all correspondence, including settlement offers, demand letters, etc. from Farmdale Water District to Mr. Lawrence for the same period.**

A-7. Attached to this Response as **Attachment 1-7a** are the minutes from the August 12, 2022 and September 9, 2022 Board of Commissioners meetings. Farmdale District is including these as they provide written documentation of communication between Mr. Lawrence and Farmdale District, despite not being a record of written correspondence.

On September 15, 2022, Farmdale District sent a letter to Mr. Lawrence offering to accept monthly partial payments of the unusually large water bill from July 2022. A copy of this letter is attached to this response as **Attachment 1-7b**. On March 20, 2023, at the request of Farmdale District, attorney for Farmdale District, James Boyd, mailed a letter to Mr. Lawrence seeking payment of the unpaid \$8,902.11 bill and inviting Mr. Lawrence to

attend the April 7, 2023 meeting of Farmdale District's Board of Commissioners if he disputed the debt. A copy of this letter is attached to this response as Attachment 1-7c. The statement inviting Mr. Lawrence to attend the board meeting if he disputed the bill is highlighted in Attachment 1-7c, but no highlighting of any kind appeared in the letter mailed to Mr. Lawrence.

# **Attachment 1-7a**

## **Board of Commissioner's Meeting Minutes**

# FARMDALE WATER DISTRICT

Commissions Meeting August 12, 2022

Present: Scottie Wooldridge, Jonathon Daily, Jamie Roberts, and Yvonne Poole

Guests, Jeff Reynolds, Richard Lawrence, John Lawrence, (376 Schofield Lane), Joy and Matt Lee

Minutes from July meeting were reviewed and approved with no additions or exceptions.

## Old Business:

Joe and Matt Lee attended the meeting to discuss their concerns about the water service/meter setting for their future house build on the former Bradley farm on South Benson Rd. There were additional discussions regarding the adjacent land recently purchased by Chad and Shawna Hill. They will work with the Hills for the best solution regarding the necessary costs. We are currently waiting for the pipe order to arrive before we can begin.

## New Business:

Our customer John Lawrence, along with his father, Richard Lawrence attended the meeting to discuss John's usage at his residence located at 376 Schofield Lane. The reading taken on July 7 indicated an extremely high usage of 1,498,200 gallons from June 6, to July 7, 2022. We provided a history from Jan 1, 2022 to present reflecting each month's readings and usage. Jamie then generated a report that shows a history of his usage activity. Richard Lawrence stated that he did not believe that the bill received and the activity report corresponded. Scottie offered to have his meter tested, which would be no charge to the customer. We agreed to contact him after the meter test has been completed.

## Water Loss:

Jeff Reynolds stated that in order to access any funds from the Water Loss Surcharge account, that we must first prepare a plan of action to reduce our water losses. Dale offered to help prepare the list and help with preparing the plan of action. We then will be required to provide invoices or quotes to support the request.



## **FARMDALE WATER BOARD COMMISSIONERS MEETING**

**September 9, 2022**

In Attendance: Scottie Wooldridge, Jonathon Dailey, Eddie Harrod

Yvonne Poole and Jamie Roberts

Guests: Lloyd Doss and Kathy Charcho

Charles Brown (Lawrence Street) scheduled to attend but did not actually come.

Minutes from the August meeting were read and approved with no additions or corrections.

### **Old Business**

#### **Lloyd Doss**

Our customer Lloyd Doss at 3918 Ninevah Rd. attended the meeting to discuss the damage done to his bathroom during a repair we made in his area. We had access to pictures of the damage. The board agreed to pay for the cost of a new commode. Yvonne will call him and let him know their decision. Mr. Doss will purchase the commode and bring us the receipt for reimbursement.

#### **Kathy Charcho**

Kathy Charcho at 123 Clearwater attended the meeting to discuss the huge water bill that she incurred from a major leak at her residence. See Attached timeline she provided. After she presented additional details, the Board agreed to contact Farmdale Sanitation who had hired Buchanan Construction to repair their lines in the area. Scottie plans to schedule a meeting with Charlie Burnette to discuss his knowledge of the damage and to determine who is actually responsible for the break. We will be in touch with Ms. Charcho after that meeting takes place. Both voting commissioners agreed.

### **Water Loss**

Jamie reported that he has not received the Water Loss Report but is expecting it today. Will report the details at a later meeting.

**John Lawrence, 376 Schofield Lane**

The commissioners reviewed the pay history for Mr. Lawrence and realized that he has not paid any amount toward his bill since July, 2022. Scottie instructed the office staff to

write him a letter, explaining that he must start paying the required monthly amount established on his balance. If he is not willing to pay the required amount then his service will be cut off for non-payment. This decision was supported by both Scottie and Jonathon.

### **New Business**

#### **Need for a new truck**

Commissioners discussed the need for a new truck and the options regarding selling our existing 450. Scottie and Eddie discussed the possibility of selling through Surplus Property. They will explore other possible options and will discuss at the next meeting.

#### **Work Orders**

There was brief discuss on the need for work orders being initialed by the staff who actually performed the work. This would be helpful for many reasons. Scottie will instruct Jamie to make sure all of these are dated and initialed.

#### **Scott Pieratt**

Mr. Pieratt sent in a request for a leak adjustment at his rental house located at 171 Demerson Lane. Jamie has been speaking with him and is now waiting to hear back from the customer. A decision will be made after further discussion with him.

The Commissioners concluded their meeting by discussing the possibility of hiring someone has had solid experience working with a water utility.

Yvonne will have Jan advertise the position in the local area and in surrounding counties.

#### **BFI**

BFI has requested that we install a 4 inch compound meter at their locations on Highway 151. Jamie will suggest that a representative from the company attend the next business meeting to discuss the process and the cost involved.

With no further business the meeting. Adjourned.

*Yvonne Poole*



# **Attachment 1-7b**

**September 15, 2022**

**Letter Offering Monthly Partial Payments**

Farmdale Water District  
100 Highwood Dr.  
FRANKFORT, KENTUCKY 40601

COMMISSIONERS:  
CLIFFORD TOLES, CHAIRMAN  
Scottie Wooldridge, Treasurer  
Jonathan Dailey, Secretary

TELEPHONE  
(502) 223-3562  
farmdalewater@gmail  
[www.farmdalewaterdistrict.com](http://www.farmdalewaterdistrict.com)

September 15, 2022

John Lawrence  
376 Schofield Lane  
Frankfort, Ky. 40601

Mr. Lawrence:

After our board meeting on Sept. 7, 2022, the Commissioners have decided to offer you an opportunity to pay the balance of your account over a 24 month period. The current balance of your account is \$9,177.87 as of today's date. A monthly payment has been calculated at \$391.66 per month. We are asking that you pay this monthly amount in addition to any regular current bill due on before 26, 2022.

If you have any questions or concerns regarding this request, please call the business office to schedule a meeting with the board On October 7<sup>th</sup>, 2022.

Scottie Wooldridge



Chairman

Farmdale Water District

# **Attachment 1-7c**

**March 20, 2023**

**Letter Seeking Payment**

**JIM BOYD LAW OFFICE**

PO Box 290, 227 West Main Street  
Frankfort KY 40602-0290

James E. Boyd\*

(502) 352-2819

jim@jimboydlawoffice.com

March 20, 2023

**PERSONAL AND CONFIDENTIAL**

John Lawrence  
376 Schofield Lane  
Frankfort KY 40601

**DELINQUENT DEBT NOTICE**

RE: Farmdale Water District  
Amount owed: \$8,902.11

Dear John Lawrence

This firm has been retained by Farmdale Water District, to collect the above listed amount.

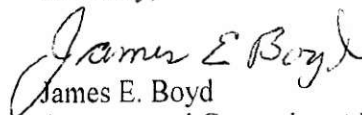
As of March 20, 2023, Farmdale Water District reflects the balance to be \$8,902.11 for your unpaid water bill at 376 Schofield Lane, Frankfort, Ky. **For further information or to set up a payment plan or to pay in full, write the undersigned or call 502-223-3562 upon receipt of this letter. YOUR PAYMENT MUST BE MADE TO THE WATER DISTRICT' OFFICE at 100 Highwood Drive, Frankfort, Kentucky**

**If you dispute this debt, you may attend the next meeting of the Board of Commissioners which will be held APRIL 7, 2023 @9:00 A.M. at 100 Highwood Drive, Frankfort, Kentucky.**

UNLESS YOU, WITHIN 30 DAYS AFTER RECEIPT OF THIS NOTICE, DISPUTE THE VALIDITY OF THE DEBT, OR ANY PORTION THEREOF, THIS FIRM WILL ASSUME THE DEBT TO BE VALID. IF YOU NOTIFY THIS OFFICE IN WRITING WITHIN THE 30 DAY PERIOD THAT THE DEBT, OR ANY PORTION THEREOF, IS DISPUTED, WE WILL OBTAIN VERIFICATION OF THE DEBT AND MAIL IT TO YOU. IF YOU SO REQUEST, WITHIN THE 30 DAY PERIOD, THIS FIRM WILL INFORM YOU OF THE IDENTITY OF THE ORIGINAL CREDITOR, IF DIFFERENT FROM THE CURRENT CREDITOR.

This is an attempt to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector.

Sincerely,

  
James E. Boyd  
Attorney and Counselor at Law

**THIS COMMUNICATION IS FROM A DEBT COLLECTOR**