

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

A SPECIAL CONTRACT BETWEEN HENRY	)	
COUNTY WATER DISTRICT NO. 2 AND BILLY	)	CASE NO. 2001-00352
BOB COOMES FOR LINE IMPROVEMENTS	)	

COMMISSION STAFF S INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO  
HENRY COUNTY WATER DISTRICT NO. 2

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Henry County Water District No. 2 ("Henry District") shall file the original and 8 copies of the following information with the Commission within 20 days of this request, with a copy to all parties of record. Each copy of the information requested shall be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention shall be given to copied material to ensure its legibility.

1. Provide all correspondence between Henry District and Mr. Coomes in which water service to the proposed real estate development is discussed.
2. Provide the minutes of each meeting of Henry District s Board of Commissioners in which the proposed contract was discussed.
3. List and describe Henry District s existing facilities in the general vicinity of the proposed real estate development.

4. Provide a map of suitable scale of the general area in which the proposed real estate development is to be located. Indicate on this map the proposed concrete plant, all existing Henry District facilities, and any facilities that Henry District will construct to serve the proposed concrete plant.

5. Describe the proposed real estate development's expected average hourly and daily demand.

6. a. State whether Henry District can provide water service to the proposed real estate development with its existing facilities.

b. If Henry District cannot provide water service to the proposed real estate development with its existing facilities, identify the facilities that are needed solely to provide water service to the proposed concrete plant.

7. a. Describe the current hydraulic state of Henry District's water distribution system in the area in which the proposed real estate development is to be located.

b. Describe the hydraulic effect upon Henry District's water distribution system if service is provided to the proposed real estate development without constructing any of the required improvements.

c. Describe the hydraulic state of Henry District's water distribution system if service is provided to the proposed real estate development and the required improvements are constructed. Provide all studies, notes, and workpapers used and all assumptions relied upon to prepare such descriptions.

8. Identify who calculated the hydraulic effect of service to the proposed real estate development upon Henry District's service. State this person's position and describe his qualifications to make such calculation.

9. Explain why the restoration of said hydraulic capacity to the water system by means of a line improvement project would be impractical and cost-ineffective at the present time.

10. a. Describe the larger future project that is intended to restore Henry District's hydraulic capacity.

b. State when Henry District expects to begin construction of this project.

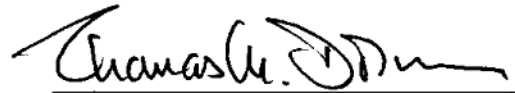
11. Describe how Henry District has determined that the average impact cost per lot is \$976. Show all calculations and state all assumptions used to make this calculation.

12. Explain how the fees contained in previous special contracts that the Commission has allowed to become effective are relevant to the determination of the proposed real estate development's hydraulic impact on Henry District's water distribution system.

13. Describe how Henry District will account for the payment of \$3904.

14. Describe the conditions that will govern the escrow account in which Mr. Coomes' payment will be placed.

15. Identify the person or entity that first proposed that Mr. Coomes make a payment to Henry District's water distribution system for the purpose of making hydraulic improvements to Henry District's water distribution system.



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Thomas M. Dorman  
Executive Director  
Public Service Commission  
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Frankfort, Kentucky 40602

DATED: February 1, 2002

cc: Parties of Record