

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SOUTH SHORE WATER WORKS COMPANY)	
)	
COMPLAINANT)	
)	
VS.)	CASE NO. 2002-00003
)	
CITY OF GREENUP, KENTUCKY)	
)	
DEFENDANT)	

COMMISSION STAFF S INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS TO
SOUTH SHORE WATER WORKS COMPANY

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that South Shore Water Works Company ("South Shore") file the original and 8 copies of the following information with the Commission no later than April 19, 2002, 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 the city of Greenup, Kentucky (Greenup) and South Shore since January 1, 1998.

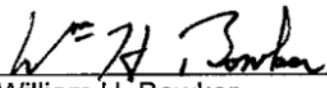
2. Provide all internal memoranda, notes, studies, reports, and similar documents in which receiving water service from Greenup is discussed.

3. State when South Shore paid a \$5,000 tap fee to Greenup.

4. a. State whether a written contract between Greenup and South Shore exists.

b. If a written contract between Greenup and South Shore exists, provide the written contract.

c. If no written contract between Greenup and South Shore exists, explain why South Shore constructed a reservoir at a higher elevation than would otherwise be required when no such contract existed.


William H. Bowker
Deputy Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602

DATED: April 4, 2002

cc: Parties of Record