

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

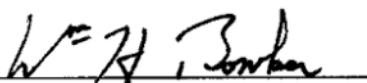
SOUTH SHORE WATER WORKS COMPANY	)	
	)	
COMPLAINANT	)	
	)	
VS.	)	CASE NO. 2002-00003
	)	
CITY OF GREENUP, KENTUCKY	)	
	)	
DEFENDANT	)	

COMMISSION STAFF S INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO CITY OF GREENUP, KENTUCKY

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that city of Greenup, Kentucky ("Greenup") 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 the minutes of each meeting of Greenup's City Council since January 1, 1998 in which the City Council discussed or considered water service to South Shore Water Works Company ( South Shore ).

2. Provide all correspondence between Greenup and South Shore since January 1, 1998.
3. Provide all internal memoranda, notes, studies, reports, and similar documents in which water service to South Shore is discussed.
4. Provide all applications, original or amended, for funding for its Phase VI Expansion that Greenup made to any state or federal government.
5. Provide all correspondence between Greenup and any funding agency regarding the funding of the construction of Greenup s Phase VI Expansion.
6. Provide all agreements and letters of conditions with any funding agency related to the funds that Greenup used to fund the construction of its Phase VI Expansion.
7. Provide all engineering studies and reviews of Greenup s Phase VI Expansion.
8. State the sources and amounts of all funds that Greenup used to fund the construction of its Phase VI Expansion.

  
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