

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE)
WATER SERVICE RATES OF THE CITY OF) CASE NO. 2002-00022
PIKEVILLE, KENTUCKY)

COMMISSION STAFF S SECOND SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
CITY OF PIKEVILLE, KENTUCKY

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that the city of Pikeville, Kentucky ("Pikeville") 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. 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.

1. Refer to Pikeville s Response to Commission Staff s First Set of Interrogatories and Requests for Production of Documents, Item 3. Provide the books of original entry in which each of the submitted invoices was recorded. A clear indication should be noted where each invoice was recorded. Each expense account should be clearly marked and totaled for the year-end.

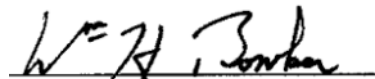
2. Provide a profit and loss statement that includes all revenue and expense accounts of Professional Services Group, Inc. (PSG) attributable to work performed for Pikeville. All entries to these accounts to record allocation of PSG common costs shall be clearly marked and explained. All accounts should be referenced to the books of original entry referred to above.

3. Provide for each month of 2001 the total number of gallons of water that Pikeville sold to:

- a. Mountain Water District.
- b. Southern Water District.
- c. Sandy Valley Water District.
- d. Retail customers.

4. a. Describe Pikeville's efforts to renegotiate its Agreement for Operations and Maintenance Services when the term of the original agreement expired.

b. If Pikeville did not seek requests for proposals from other firms when renegotiating its Agreement for Operations and Maintenance Services, explain why.


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

DATED: April 5, 2002

cc: Parties of Record