

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

A SPECIAL CONTRACT BETWEEN HENRY COUNTY)
WATER DISTRICT NO. 2 AND PEARCE BROTHERS) CASE NO. 2001-351
READY MIX CONCRETE SUPPLY, INC.)

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") 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 the representatives of Pearce Brothers Ready Mix Concrete Supply Company, Inc. (Pearce Brothers) in which water service to the proposed concrete plant 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 concrete plant.

4. Provide a map of suitable scale of the general area in which the proposed concrete plant 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 concrete plant's expected average hourly and daily demand.

6. a. State whether Henry District can provide water service to the proposed concrete plant with its existing facilities.

b. If Henry District cannot provide water service to the proposed concrete plant 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 concrete plant is to be located.

b. Describe the hydraulic effect upon Henry District's water distribution system if service is provided to the proposed concrete plant 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 concrete plant and the required improvements are constructed. Provide all studies, notes, workpapers and assumptions used to prepare such descriptions.

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

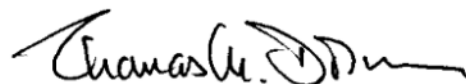
9. Describe how the hydraulic effect of service to the proposed concrete plant was derived.

10. Describe how the proposed improvements will return Henry District's system to the same hydraulic conditions that existed prior to service to the proposed concrete plant.

11. State the number and type of customers that Henry District serves in the general vicinity of the proposed concrete plant.

12. State whether the required improvements will enable Henry District to serve other customers within the general vicinity of the proposed concrete plant whom previously were not served.

13. If the proposed improvements will enable Henry District to serve other customers within the general vicinity of the proposed concrete plant who previously were not served, explain why Pearce Brothers should not be afforded a refund for each customer who connects directly to the proposed improvements.



Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602

DATED: January 24, 2002

cc: Parties of Record