

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CLEARWATER DISPOSAL, )  
INC. TO CONNECT ITS COLLECTION SYSTEM )  
TO THE CITY OF MIDDLESBORO WASTEWATER ) CASE NO. 2004-00527  
TREATMENT FACILITIES AND TO ABANDON ITS )  
WASTEWATER TREATMENT OPERATIONS )

COMMISSION STAFF'S INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO  
CLEARWATER DISPOSAL, INC.

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Clearwater Disposal, Inc. ("Clearwater Disposal") file the original and 5 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 should 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 should 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. When applicable, the requested information should be provided for total company operations and jurisdictional operations, separately.

1. Provide all agreements between Clearwater Disposal and the city of Middlesboro ("Middlesboro") regarding the connection of Clearwater Disposal's collection system to Middlesboro's sewer collection and treatment system.

2. Provide a schedule of Middlesboro's current rates for sanitary sewer service if the current rates differ from those set forth in Mr. Richard Vaughn's letter of December 21, 2005.

3. Show the calculations and state all assumptions for Clearwater Disposal's estimate that "the average sewer rate for residences in the Ambleside community will increase from \$18.66 to \$20.00."

4. Provide a copy of all written notices of the proposed abandonment and transfer that Clearwater Disposal has made to its customers regarding the proposed transfer of its collection system and any change in the rates for sanitary sewer services.

5. Describe Middlesboro's managerial and technical ability to provide reasonable sanitary sewer service. This description should include a discussion of the Middlesboro's collection and treatment facilities and the qualifications of the persons who Middlesboro retains to manage and operate those facilities.

6. State the number of persons that Middlesboro employs who are certified wastewater treatment plant operators and the level of certification that each person holds.

7. Provide a copy of most recent financial audit report on the operation of Middlesboro's wastewater collection and treatment facilities.

8. a. State the amount of customer deposits that Clearwater Disposal currently holds.

b. Describe Clearwater Disposal's intentions regarding these customer deposits upon the retirement of Clearwater Disposal's wastewater treatment facilities and the transfer of its collection system.



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Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED:   JULY 20, 2005  

cc: Parties of Record