

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KENTUCKY DAM VILLAGE STATE RESORT)	
PARK, KENTUCKY DEPARTMENT OF PARKS,)	CASE NO.
COMMERCE CABINET)	2006-00365
)	
COMPLAINANT)	
)	
V.)	
)	
NORTH MARSHALL WATER DISTRICT)	
)	
DEFENDANT)	

COMMISSION STAFF'S SECOND INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
ON NORTH MARSHALL WATER DISTRICT

North Marshall Water District ("North Marshall"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before May 15, 2007. Each copy of the data 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 person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible.

Each response shall be under oath or, for representatives of a public or private corporation, a partnership, an association or a governmental agency, be accompanied

by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

North Marshall shall make timely amendment to any prior response if it obtains information upon the basis of which it knows that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which North Marshall fails to furnish all or part of the requested information, North Marshall shall provide a written explanation of the specific grounds for its failure to furnish.

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. When applicable, the requested information shall be provided for total company operations and jurisdictional operations, separately.

1. North Marshall's tariff at II.C.4.b) provides on Sheet 11 that "Water service will be billed bimonthly with bills mailed on or about the 20th of each even numbered month."

a. Explain how North Marshall defines the term "on or about" as that term is used on Sheet 11.

b. Include in that explanation the latest date of a billing month that North Marshall considers to be within the range of "on or about."

2. The postmark date on the bill sent by North Marshall to Kentucky Dam Village ("KDV") is April 25, 2006.

a. Explain why there was a delay until the 25th day of the month for North Marshall to mail the subject bill to KDV.

b. Does North Marshall consider a bill postmarked on the 25th day of the month to have been mailed "on or about" the 20th day of the month?

3. If available, provide a copy of the envelope sent by KDV to North Marshall containing KDV's subject payment.

4. If available, provide a copy of any cover letter or document or other item accompanying KDV's subject payment.

5. What are the exact date(s) that North Marshall (a) received and (b) posted the subject payment from KDV?

6. Refer to your response to Item 7 of Commission Staff's First Data Request, which states that the Department of Parks submitted payment on or about May 15, 2006, and refer to the Customer History Report for account 102480, "KY Dam Village State," that you submitted in your Supplement to Discovery Compliance, which shows the late fee assessed on May 15, 2006. If those dates are accurate, state why a late fee was assessed when the payment was received on that same date.



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

DATED: May 4, 2007

cc: Parties of Record