

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE	)	
JURISDICTIONAL STATUS OF SEVERAL	)	CASE NO.
COMPANIES IN PIKE COUNTY, KENTUCKY	)	2024-00271
AND OF THEIR COMPLIANCE WITH KRS	)	
CHAPTER 278 AND 807 KAR CHAPTER 005	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO ROOPANI DEVELOPMENT CORPORATION

Roopani Development Corporation (Roopani Development ), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on August 8, 2025. The Commission directs Roopani Development to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

---

<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Roopani Development shall make timely amendment to any prior response if Roopani Development obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Roopani Development fails or refuses to furnish all or part of the requested information, Roopani Development shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. 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 separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Roopani Development shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. With regard to drinking water, identify each address of each residential or commercial buildings/structures located in or near the Zebulon Heights Community<sup>2</sup> that Roopani Development participated in providing, or is currently providing water for public consumption.

---

<sup>2</sup>The Zebulon Heights Community is a small area located off of US 119. It includes all residential and commercial structures located on Village View Drive, Devin Ryans Way, Zebulon Heights, Boulders East, and Prater Drive all side streets..

2. For each address identified in Item 1, state whether Roopani Development installed a meter, had a meter installed, or is monitoring a meter installed by anyone else, and if so, provide the following information regarding the installed meters:

- a. State whether the buildings/structures are individually metered or jointly metered.
- b. State whether Roopani Development reads the meters.
- c. State whether Roopani Development submits bills to the property owners.
- d. State how overdue bills are collected.
- e. Are there payment plan options?
- f. Are there due date extensions?
- g. Are there Financial Assistance programs?
- h. What are the disconnection policies?
- i. What are the late fees and penalties?
- j. Is there budget billing?
- k. What are the impacts of partial payments?

3. Does Roopani Development currently own, or previously owned, a pump station to provide water for public consumption. If so,

- a. Did Roopani Development install the pump station?
- b. State when the pump station was installed.
- c. State whether or not it was inspected by the Department of Housing, Buildings & Construction, Division of Plumbing.

d. State whether there was a contract for the purchase of the pump station. If so, provide a copy of the contract for the purchase the pump station.

4. For each address identified in Item 1, state whether Roopani Development installed service lines and provide the following information regarding the installed service lines:

a. State whether Roopani Development installed the service lines and whether permits were obtained before starting installation.

b. If Roopani Development installed service lines, were the lines inspected by the Department of Housing, Buildings & Construction, Division of Plumbing?

c. If inspected, provide proof of compliance with the Kentucky State Plumbing Code.

d. If Roopani Development installed the service lines, state the diameter of the lines.

5. For each address identified in Item 1, state whether Roopani Development installed any other fixtures related to drinking water. If so, state whether those fixtures were inspected by the Department of Housing, Buildings & Construction, Division of Plumbing and provide proof of compliance with the Kentucky State Plumbing Code.

6. State whether Roopani Development is involved with diverting, developing, pumping, impounding, distributing, or furnishing water for public consumption.

7. State whether Roopani Development has filed an annual report with the Commission.

8. State whether Roopani Development filed a tariff with the Commission.

9. State whether Roopani Development is a party to any contractual agreements, whether written or verbal, regarding diverting, developing, pumping, impounding, distributing, or furnishing water for public consumption.

10. Provide copies of any written contract(s) that Roopani Development is a party to regarding diverting, developing, pumping, impounding, distributing, or furnishing water for public consumption.

11. Regarding wastewater, identify each address of each residential or commercial buildings/structures located in or near the Zebulon Heights Community that Roopani Development participated in providing, or is currently providing sanitary sewer service or installed sanitary sewer lines.

12. For each address identified in Item 11, state what type of wastewater treatment system was installed and provide the following:

- a. State the capacity of each system.
- b. State who installed each system.
- c. If a septic system or lagoon wastewater treatment was installed, state whether an individual system and leach field was installed for each address, or multiple addresses that share the wastewater treatment system.
- d. If the wastewater treatment system serves multiple addresses, state the coordinates of the system, and state who owns the real property the system is located on.
- e. State whether the wastewater treatment system was approved and inspected by the local health department. If so, provide copies of all inspection reports.

f. State whether there are multiple addresses connected to a single wastewater system.

g. If there are multiple addresses connected to one system, identify who operates the wastewater treatment system.

h. If a package plant was installed, identify who installed the package plant and provide the following:

(1) State whether a construction permit obtained from the Energy and Environment Division of Water to build the wastewater treatment plant (plant).

(2) State who is the owner of the plant.

(3) State who is the operator of the plant.

(4) State whether a Kentucky Pollutant Discharge Elimination System permit obtained for the plant.

(5) State what body of water the package plant discharges into.

(6) State the coordinates of the package plant.

(7) State who owns the real property the package plant is located on.

13. For each address identified in Item 11, state whether any other type of wastewater treatment system was installed such as a spray irrigation system. If so,

a. Who installed the system?

b. Who owns the system? and

c. Who operates the system?

14. For each address identified in Item 11, state whether Roopani Development is involved in the collection, transmission, or treatment of sewage.

15. State whether Roopani Development ever filed an annual report with the Commission regarding wastewater treatment. If so, provide the filing date of each report.

16. State whether Roopani Development filed a tariff with the Commission regarding wastewater treatment

17. For each address identified in Item 11, state whether the commercial buildings/structures located in the Zebulon Heights Community are subject to regulation by a metropolitan sewer district or any sanitation district created pursuant to KRS Chapter 220.

18. State how the fees for sewage treatment are collected and how overdue bills are collected. In addition, provide the following:

- a. State whether there payment plan options.
- b. State whether there are due date extensions.
- c. State whether there are Financial Assistance programs available.
- d. State the disconnection policies
- e. Provide the late fees and penalties.
- f. State whether there is budget billing.
- g. State the impacts of partial payments.
- h. State whether there is an online account option.

19. State if Roopani Development intends to continue providing water service, and if not, state if Roopani Development contacted any other entities regarding taking over the water service and state the name of the entity.

20. Please state whether there is ongoing construction east of Zebulon Heights Community and how drinking water and wastewater services will be furnished to that area.



---

Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED   JUL 25 2025  

cc: Parties of Record



Roopani Development Corporation  
249 Kati Street  
Pikeville, KY 41501

\*Destiny Hamilton Pugh  
Hamilton & Stevens, PLLC  
P. O. Box 1286  
Pikeville, KY 41502

\*Sarah Gaddis  
Director  
Kentucky Division of Water  
300 Sower Boulevard, 3rd Floor  
Frankfort, KY 40601

Charles Mason McCoy  
Registered Agent  
Twin Diamond, LLC  
554 Northmonte Woods  
Pikeville, KY 41501

\*Emily Vessels  
Dinsmore & Shohl, LLP  
101 South Fifth Street  
Suite 2500  
Louisville, KY 40202

\*Mountain Water District  
Mountain Water District  
6332 Zebulon Highway  
P. O. Box 3157  
Pikeville, KY 41502-3157

Appalachian Building Services, LLC  
9980 Bent Branch Road  
Pikeville, KY 41501

\*Gerald E Wuetcher  
Attorney at Law  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KY 40507-1801

\*Twin Diamond, LLC  
554 Northmonte Woods  
Pikeville, KY 41501

Roopani Development Corporation  
9017 Baywood Park Drive  
Seminole, FL 33777

\*Hunter A. Branham  
Johnson Law Firm, PSC  
229 Main Street  
P.O Box 1517  
Pikeville, KY 41501

Prater Construction  
36 Maple Lane  
Pikeville, KY 41501

\*John G Horne, II  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*William R. Johnson  
Johnson Law Firm, PSC  
229 Main Street  
P.O Box 1517  
Pikeville, KY 41501

\*Lesha Prater  
Prater Construction  
36 Maple Lane  
Pikeville, KY 41501

\*R. Brooks Herrick  
Dinsmore & Shohl, LLP  
101 South Fifth Street  
Suite 2500  
Louisville, KY 40202

\*Ray S Jones II  
Judge/Executive  
146 Main Street  
Pike County Courthouse  
Pikeville, KY 41501