

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 TWIN DIAMOND, LLC

Twin Diamond, LLC (Twin Diamond), 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 13, 2025. The Commission directs Twin Diamond to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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.

Twin Diamond shall make timely amendment to any prior response if Twin Diamond 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 Twin Diamond fails or refuses to furnish all or part of the requested information, Twin Diamond 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, Twin Diamond shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Describe the type of business in which Twin Diamond is engaged.
2. With regard to all real estate, including both commercial and residential rentals, that Twin Diamond or its organizer, registered agent and member, Charles McCoy, is the owner of in or around the Zebulon Heights Community² state whether Twin

² 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.

Diamond is providing or transporting drinking water to any of those tenants and list those tenants by address.

3. Referring to Twin Diamonds Verified Response to Commission's October 1, 2024 Order (Verified Response), Exhibit A filed on February 28, 2025:

- a. Identify the owner(s) of the discussed pump house.
- b. Identify the owner(s) of the real property upon which the pump house is located.
- c. State how the costs/expenses of running and maintaining the pump house are allocated between the properties served by the pumphouse.

4. In the Twin Diamond's Verified Response, Twin Diamond alleges as follows:

Twin Diamond invoices Prater Construction by directly passing through the costs charged by Mountain Water District for the amount of water used by Prater Construction, as measured by the meter installed by Prater Construction and communicated to Twin Diamond by Prater Construction.³

Further Twin Diamond alleges that it “. . . has no intent to allow any other person or entity to utilize the pump house.”⁴

- a. Provide the written agreement(s), if any, Twin Diamond has with Prater Construction not to add “. . . any other person or entity to utilize the pump house.”
- b. If no written agreements exist, provide any and all details regarding the substance of any alleged agreement and any facts indicating that said agreement(s) exist.

³ Twin Diamond's Verified Response (filed Feb. 28, 2025) at 2.

⁴ Twin Diamond's Verified Response at 2.

5. Provide a map that indicates the location of the pump station owned by Twin Diamond, the layout of the water lines, the location and brief description of each meter on the system, include the longitude and latitude of the pump station.

6. For each address identified in Item 2, state whether Twin Diamond installed a drinking water meter, and provide the following information regarding the installed meters:

a. State whether the buildings/structures are individually metered or jointly metered.

b. State whether Twin Diamond reads the meters.

c. State whether Twin Diamond submits bills to the property owners.

d. State how overdue bills are collected.

e. Explain if Twin Diamond administers one or more payment plan options.

f. Explain if Twin Diamond provides water customers due date extensions.

g. Explain if Twin Diamond offers or coordinates with Financial Assistance programs.

h. Provide copies of Twin Diamond's disconnection policies.

i. Confirm if Twin Diamond administers one or more late fees and penalties related to water service.

7. For each address identified in Item 2, state whether Twin Diamond installed service lines and provide the following information regarding the installed service lines:

a. State whether permits were obtained before starting installation.

b. If Twin Diamond installed service lines, explain if 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 Twin Diamond installed the service lines, state the diameter of the lines.

8. State whether Twin Diamond 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.

a. State whether those fixtures were designed by a registered professional engineer, and if so, identify that engineer.

b. State whether the plans for those fixtures were approved by the Division of Water and if so, indicate when they were approved.

9. State whether Twin Diamond ever filed an annual report with the Commission.

10. State whether Twin Diamond filed a tariff with the Commission.

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

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

13. Regarding wastewater, state whether Twin Diamond installed sanitary sewer lines from any residential or commercial buildings/structures located in the Zebulon Heights community.

14. For each residential or commercial building/structure, identify by address, and state what type of wastewater treatment system was installed and provide the following:

a. State the capacity of each system.

b. identify 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 addresses the system serves 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 written proof.

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

g. 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 Cabinet, Division of Water to build the wastewater treatment plant (plant).

- (2) Identify the owner of the plant.
- (3) Identify the operator of the plant.
- (4) State whether a Kentucky Pollutant Discharge Elimination

System permit obtained for the plant.

- (5) Identify the body of water the package plant discharges into.
- (6) Provide the coordinates of the package plant.
- (7) Identify the owner the real property the package plant is

located on.

15. State whether Twin Diamond is involved in the collection, transmission, or treatment of sewage.

16. State whether Twin Diamond ever filed an annual report with the Commission regarding wastewater treatment. If an annual report was provided to the Commission, state the date the annual report was filed.

17. State whether Twin Diamond filed a tariff with the Commission regarding wastewater treatment.

18. State whether the commercial buildings/structures located in or around the Zebulon Heights Community are subject to regulation by a metropolitan sewer district or any sanitation district created pursuant to KRS Chapter 220.

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

- a. State whether there are payment plan options.
- b. State whether there are due date extensions.
- c. State whether there are Financial Assistance programs available.

- d. State the disconnection policy.
- e. Provide the late fees and penalties.
- f. State whether there is a budget billing option.
- g. State the impacts of partial payments.
- h. State whether there is an online account option.
- i. Provide a copy of any policies.

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.

 

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DATED **JUL 29 2025**

cc: Parties of Record

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