

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF MALLARD POINT)
DISPOSAL SYSTEMS, INC. AND THE CITY OF)
GEORGETOWN, KENTUCKY FOR AN ORDER)
APPROVING THE TRANSFER OF OWNERSHIP) CASE NO. 2013-00311
OF THE WASTEWATER COLLECTION SYSTEM)
OF THE MALLARD POINT DISPOSAL SYSTEMS,)
INC. TO THE CITY OF GEORGETOWN,)
KENTUCKY)

COMMISSION STAFF'S REQUEST FOR INFORMATION
TO MALLARD POINT DISPOSAL SYSTEMS, INC. AND THE CITY OF
GEORGETOWN, KENTUCKY

Mallard Point Disposal Systems, Inc. ("Mallard Point Disposal") and the City of Georgetown, Kentucky ("Georgetown") (collectively "Joint Applicants"), pursuant to 807 KAR 5:001, are to file with the Commission no later than September 23, 2013 the original and ten copies of the following information, with a copy to all parties of record. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response 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 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.

Joint Applicants shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Joint Applicants fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention should be given to copied 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.

1. List and describe the nature of all legal actions in which Georgetown or Georgetown Municipal Water and Sewer Service ("GMWSS") is a party and which involve the operations of its sewer operations.

2. List and provide a copy of each notice of violation ("NOV") that Georgetown or GMWSS has received regarding the operation of its sewer facilities from the Kentucky Division of Water since January 1, 2008. State the current status of each NOV.

3. List and provide a copy of each NOV that Mallard Point Disposal has received regarding the operation of its sewer facilities from the Kentucky Division of Water since January 1, 2008. State the current status of each NOV.

4. Describe the current status of the proposed agreed order that is attached to the Asset Transfer Agreement.

5. Provide a copy of the final engineering report, including the design specifications, for the wastewater pumping station that Georgetown intends to construct to serve the area that Mallard Point Disposal presently serves.

6. Provide all correspondence between Georgetown and the Kentucky Division of Water regarding Georgetown's acquisition of Mallard Point Disposal's facilities.

7. Provide all reports, analyses, and studies that Georgetown prepared or commissioned on the proposed acquisition, including the financing of proposed acquisition and construction of the proposed pumping facilities.

8. State the number of Georgetown's customers who:

- a. Reside within Georgetown's corporate limits; and
- b. Reside outside Georgetown's corporate limits.

9. State whether Georgetown provides water service to the area that Mallard Point Disposal currently provides sewer service.

10. For the wastewater assets that Georgetown purchased from the city of Stamping Ground ("Stamping Ground") in 2006, state:

- a. The original cost of the purchased assets;
- b. The assets' net book value on the purchase date; and
- c. The purchase price.

11. For the wastewater assets that Georgetown purchased from the city of Sadieville ("Sadieville") in 2012, state:

- a. The original cost of the purchased assets;
- b. The assets' net book value on the purchase date; and

c. The purchase price.

12. Explain why after completion of the transaction Georgetown will not be charging persons currently served by Mallard Point Disposal the same rates as it charges other Georgetown sewer customers.

13. Provide a copy of Georgetown's current rate schedule for sewer service.

14. State when Georgetown expects to charge persons currently served by Mallard Point Disposal the same rates as other Georgetown sewer customers. Describe how Georgetown determined this time period.

15. Describe how Georgetown priced its sewer service to customers that were served by the wastewater systems that were operated by Stamping Ground and Sadieville after Georgetown acquired each of those systems.

16. Describe how Georgetown intends to finance the cost of purchasing Mallard Point Disposal's assets.

17. Describe how Georgetown intends to finance the cost of constructing the proposed pumping station that will serve Mallard Point Disposal customers.

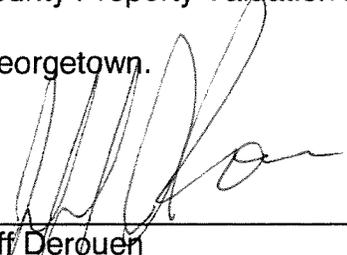
18. Provide a copy of Georgetown's current regional facility plan. In lieu of submitting an original and ten copies in paper medium, an electronic version in portable document format on electronic storage medium may be submitted.

19. Provide a copy of all appraisals of the assets to be transferred that have been performed since January 1, 2008.

20. List and describe all material changes to Georgetown's financial condition since June 30, 2012.

21. State whether the description of GMWSS's wastewater collection and treatment assets as found in *Kentucky Wastewater Management Plan* is accurate.¹

22. State the value at which the Scott County Property Valuation Administrator assesses the property that will be transferred to Georgetown.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602

DATED SEP 16 2013

cc: Parties of Record

¹ The most current version of this plan is available at http://kia.ky.gov/NR/rdonlyres/9A094655-E931-4A98-8F07-914CE0A50D2E/0/CW_ManagementPlan_State_062513.pdf.

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