

**CASE NO. 2018-00208**  
**WATER SERVICE CORPORATION OF KENTUCKY**  
**RESPONSES TO COMMISSION STAFF'S POST-HEARING DATA REQUESTS**

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1. Refer to Water Service Kentucky's testimony regarding Ambleside, LLC, (Ambleside) monthly fire hydrant charges.
  - a. State the efforts made to collect payment from Ambleside or any other entity from the time that payments stopped.
  - b. Provide Water Service Kentucky's policy for nonpayment of services.
  - c. Provide all documentation or internal correspondence regarding the policy to categorize the fire hydrant charges as bad debt rather than pursue collection proceedings.
  - d. Provide all external correspondence between Water Service Kentucky and entities regarding nonpayment of services, including but not limited to Ambleside, any homeowners association, and residents served by the private fire hydrants.
  - e. Calculate and list by year, the unpaid billing for Ambleside from the time that payments stopped.
  - f. State why Water Service Kentucky did not address the Ambleside area fire hydrants in its prior rate case, Case No. 2015-00382.

Original Response:

- a. Attached please find documents the WSCK has been able to locate. If the other letters referenced in those documents are located, they will be provided.

Supplemental Response:

- a. Please see the attached documents, most of which were located in a search of the former General Counsel's email account. The documents generally reveal (1) correspondence

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between the utility and counsel for Ambleside, Ltd, (2) correspondence involving the utility's assignment of collection efforts to a collection agency, and (3) and recent collection letters sent to Ambleside.

For the purposes of clarification of the question, correspondence and collection efforts have been with Ambleside, Ltd., as opposed to Ambleside, LLC.

WSCK is providing this information pursuant to 807 KAR 5:001, Section 4(12)(4), which requires an amendment of responses to information requests when a party determines that a previous response is determined to be incorrect based on subsequently discovered information. WSCK searched for relevant materials prior to the deadline for production but did not locate the material until after deadline.

WSCK's responses to subparts (b)-(f) do not change, although WSCK notes that the cross-reference in response to subpart (d) is effectively amended to incorporate the attached documentation.

Witness:        Steven Lubertozi

**CLINE LAW OFFICE**  
**P.O. BOX 2220**  
**205 NORTH 20TH STREET**  
**MIDDLESBORO, KENTUCKY 40965**  
**website: jpclinelawfirm.com**

**J. P. CLINE III**  
**(email: [pete@jpclinelaw.com](mailto:pete@jpclinelaw.com))**

**1-606-248-8001 (Office)**  
**1-606-248-8049 (Fax)**

November 6, 2008

Water Service Corporation  
of Kentucky  
P.O. Box 818  
Middlesboro, Kentucky 40965

Re: Ambleside Water Hydrants

Dear Sir or Madam:

Representatives of Ambleside have requested I contact you as their counsel regarding continuing charges assessed for water hydrants serving the Ambleside Subdivision community. For many years, Ambleside has paid these rental charges to your company, but Ambleside has recently realized that all water hydrants are situated on county-owned and maintained roadways which were dedicated to and assumed by the Bell County Fiscal Court several years ago. Accordingly, it is the position of Ambleside that these water hydrants are inappropriately classified as "private hydrants" subject to the monthly rental charges. As all streets in Ambleside are dedicated to and maintained by the Bell County Fiscal Court, any monthly rental for these fire hydrants should either not be encumbered by any monthly rental charge or should receive the rental rate, if any, paid by Bell County for water hydrants situated on its public roadways. Further, the Bell County Fiscal Court is the proper entity responsible for hydrant rental charges, if any.

I request you review this matter with the appropriate authorities within your organization and provide a response to this request. Essentially, Ambleside is stating that its monthly water hydrant rental costs from your organization are inappropriate as all water hydrants situated in the Ambleside community are situated upon a public roadway dedicated to, owned and maintained by the Bell County Fiscal Court.

I look forward to your response to this matter, and with best regards, I remain,

Sincerely yours,



J. P. CLINE III



December 11, 2008

Mr. J. P. Cline, III  
Cline Law Office  
PO Box 2220  
205 North 20<sup>th</sup> Street  
Middlesboro, KY 40965

Re: Ambleside Water Hydrants

Dear Mr. Cline,

Your November 6 letter concerning the above matter has been referred to me. Please accept my apologies for the delayed response.

Water Service Corp. of Kentucky (WSCK) is a regulated utility that has been authorized by the Public Service Commission of Kentucky to provide water services to the City of Middlesboro and other areas, including the Ambleside subdivision. The Commission also approves WSCK's tariff for water services, and our approved tariff includes the hydrant fees referred to in your letter.

As you may know, Bell County does not have a municipal water system. The only system that serves the Ambleside area is owned, operated and maintained by WSCK. Although the hydrants in Ambleside are located on county maintained public roads, they are the property of WSCK and are subject to the fees stated in our tariff. You may confirm these facts directly with Bell County.

Your letter refers to the classification of the Ambleside hydrants as "private hydrants." The term "private hydrants" is defined in our tariff and simply refers to those hydrants for which the service charge is not paid by the City of Middlesboro. Since the City does not pay the charges associated with any of the Ambleside hydrants, all of them are properly considered private hydrants and are billed on that basis.

I hope this letter adequately addresses your clients' concerns. If you have any further questions, please contact me at the location noted below.

Very truly yours,

A handwritten signature in black ink, appearing to be the initials "JS" or "JK" with a stylized flourish.

John Stover  
Vice President and General Counsel

**From:** James Leonard  
**Sent:** Monday, November 23, 2009 8:22 AM  
**To:** Adrienne Krugler  
**Cc:** Renee McIntyre; Reba Standifer; Martin Lashua  
**Subject:** RE: shut off for [REDACTED]

Hi Adrienne,

This account is for "Private Fire Hydrants" that a developer (Ambleside) agreed to pay for 20 years ago however, changed their mind in 2008 about paying. Approximately 600 residential customers make up this subdivision. Recently the development was "built out" with no additional building lots. They haven't made a payment for these Fire Hydrants now in 12 months. The account balance is \$3080.00 today.

As long as they were requesting water main extensions, hydrant to install according to engineering standards, taps to be made for customers who were purchasing lots in Ambleside, monthly Fire Hydrant Fee's were submitted on time.

The Developer had his attorney write WSCK the attached letter telling us our water hydrants were located on Bell County roadways. WSCK should seek payment from the Bell Fiscal Court. WSCK had no existing agreement's or contracts from the past whenever Private Fire Hydrants were installed. John Stover was made aware of this and did reply to Cline Law office with a response letter however, WSCK has no resolution for this account at this time.

Thanks,  
James Leonard, Regional Manager  
Utilities, Inc.  
Water Service Corporation of KY



Steven L. Beshear  
Governor

Leonard K. Peters  
Secretary  
Energy and Environment Cabinet

Commonwealth of Kentucky  
**Public Service Commission**  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, Kentucky 40602-0615  
Telephone: (502) 564-3940  
Fax: (502) 564-3460  
psc.ky.gov

July 19, 2010

David L. Armstrong  
Chairman

James W. Gardner  
Vice Chairman

Charles R. Borders  
Commissioner

Mr. Martin Lashua  
Utilities, Inc.  
P.O. Box 240908  
Charlotte, NC 28217

Dear Mr. Lashua:

**PSC STAFF OPINION NO. 2010-00016**

Commission Staff is in receipt of your letter of May 3, 2010 regarding fire hydrants that Water Service Corporation of Kentucky ("Water Service Corporation") owns and operates in the Ambleside Subdivision of Bell County, Kentucky.

Commission Staff understands the facts are as follows:

Water Service Corporation, a subsidiary of Utilities, Inc., owns and operates facilities that distribute water to and for the public in and around Middlesboro, Kentucky, including the Ambleside Subdivision. Ambleside Subdivision is an unincorporated area of Bell County.

Ambleside Subdivision was initially developed in 1982. Twenty-one hydrants are located in the subdivision on county-owned and maintained roads. Water Service owns and maintains these hydrants. Three times a year it flushes and inspects the hydrants. It tests the flow and paints the hydrants every five years. Water Service Corporation is responsible for replacing damaged and inoperable hydrants.

Under the terms of its filed rate schedules, Water Service may assess a monthly fee of \$4.30 for public fire hydrants within the city of Middlesboro. It assesses this fee to the city of Middlesboro. Water Service Corporation's fire protection rate schedule provides for a monthly fee of \$19.35 for private hydrants and sprinkler systems.

Ambleside, Ltd. ("Ambleside"), a for-profit Kentucky corporation that was organized in January 1981, has assumed responsibility for the fire protection charges

associated with fire hydrants in the Ambleside Subdivision since the subdivision's inception. Ambleside was a customer in good standing through November 11, 2008. In November 2008, Ambleside, through its legal counsel, contacted Water Service Corporation and advised that Water Service Corporation's assessment of the hydrant charges was inappropriate because the hydrants were located on county maintained, public roads and should be the responsibility of Bell County. Ambleside last paid its bill from Water Service Corporation on November 11, 2008, and has an outstanding balance of \$5,873.70.

In your letter, you request "a staff opinion on the validity of our [Water Service's] charges and the customer's responsibility to pay these charges." You also requested a "recommendation on remedy for this situation as it is not practical for us to consider turning off the water to these hydrants as a matter of public protection to the residents and homeowners."

KRS 278.030(1) provides that "[e]very utility may demand, collect and receive fair, just and reasonable rates for services rendered or to be rendered by it to any person." KRS 278.160(1) requires such rates be set forth in a schedule filed with the Commission. KRS 278.160(2) provides:

No utility shall charge, demand, collect, or receive from any person a greater or less compensation for any service rendered or to be rendered than that prescribed in its filed schedules, and no person shall receive any service from any utility for a compensation greater or less than that prescribed in such schedules.

Water Service Corporation's filed rate schedule currently provides for a monthly rate of \$19.35 per private hydrant. The Commission approved this rate in Case No. 2008-00563.<sup>1</sup> KRS 278.160(2) requires that Water Service Corporation charge that rate when applicable.

Commission Staff is of the opinion that Ambleside continues to be responsible for the fire hydrant charges associated with the hydrants within the Ambleside Subdivision. Ambleside initiated its utility-customer relationship in 1982 when Water Service's predecessor (Kentucky Water Service, Inc.) installed the hydrants. For 26 years, it paid the prescribed rates for the hydrants without challenge. Although the hydrants are located on county-owned and maintained roads, no evidence has been presented to suggest that Bell County Fiscal Court has assumed responsibility for the monthly hydrant fee.

Utilities seeking remedies for non-payment generally have few options. The Commission does not have the authority to award damages; therefore, any collections

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<sup>1</sup> Case No. 2008-00563, *Water Service Corporation of Kentucky* (Ky. PSC Nov. 9, 2009).

Mr. Martin Lashua

July 19, 2010

Page 3

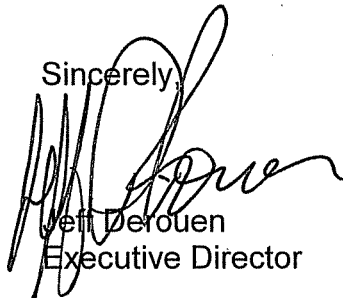
action against a non-paying customer must be resolved in the court system. Commission regulations, however, enable a utility to disconnect service for non-payment of bills. 807 KAR 5:006, Section 14(1)(f). Commission Staff recognizes that disconnection of hydrants is unique, in that several property owners benefit from the fire protection that the hydrants afford. Disconnection of the hydrants will likely result in higher insurance premiums for homeowners with the subdivision and increase the risk of catastrophic fire loss.

Nevertheless, a utility increases its expenses when it installs hydrants and provides sufficient water flow for fire protection. Water Service Corporation's rates are designed to recover those additional expenses. Failure to collect the required rates will force other utility customers who receive no benefit from the hydrants in question to absorb these costs through their rates.

For your reference, enclosed is a copy of the Commission's Order in Case No. 2007-00450<sup>2</sup> in which the Commission addressed a similar factual situation. The course of action that the affected water utility proposed to undertake may be instructive.

This letter represents Commission Staff's interpretation of the law as applied to the facts presented. This opinion is advisory in nature and not binding on the Commission should the issues herein be formally presented for Commission resolution. Questions concerning this opinion should be directed to Todd Osterloh, Staff Attorney, at (502) 564-3940, Extension 439.

Sincerely,



Jeff Derouen  
Executive Director

Enclosure

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<sup>2</sup> Case No. 2007-00450, *Kentucky-American Water Co.* (Ky. PSC Feb. 28, 2008).



COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF KENTUCKY-AMERICAN )  
WATER COMPANY FOR PERMISSION AND )  
AUTHORIZATION TO DISCONNECT ) CASE NO. 2007-00450  
CUSTOMERS FOR NON-PAYMENT OF FIRE )  
SERVICE CHARGES )

ORDER

Kentucky-American Water Company ("Kentucky-American") has petitioned for Commission authorization to disconnect certain customers who receive fire protection service for non-payment of the charges for that service. Finding that Administrative Regulation 807 KAR 5:006, Section 14, authorizes a utility to discontinue service for non-payment without specific Commission authorization, we deny the petition as moot.

Kentucky-American, a corporation organized under the laws of the Commonwealth of Kentucky,<sup>1</sup> owns and operates facilities that treat and distribute water to the public for compensation in Kentucky. It provides water service to approximately 115,575 customers in Bourbon, Clark, Fayette, Gallatin, Grant, Harrison, Jessamine, Owen, Scott, and Woodford counties, Kentucky.<sup>2</sup> It is a utility subject to Commission jurisdiction.<sup>3</sup>

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<sup>1</sup> See Online Business Database, Kentucky Secretary of State Trey Grayson <http://apps.sos.ky.gov/business/obdb/default.aspx> (last visited Feb. 17, 2008).

<sup>2</sup> Report of Kentucky-American Water Company to the Kentucky Public Service Commission for the Year Ended December 31, 2006 at 5 and 30.

<sup>3</sup> KRS 278.010(3)(d); KRS 278.040(1).

Kentucky-American requests authority to discontinue fire protection to six customers who are receiving private fire hydrant service or fire protection service and are not current in the payment of their bills. It states that the delinquency period for each of these customers "has run well beyond the minimum period for termination of service."<sup>4</sup> Kentucky-American further states that it has notified each of the customers in question of its intent to terminate service. It has also notified the local fire departments that serve these customers and Insurance Services Office.<sup>5</sup>

As a general rule, water utilities may terminate service to customers for nonpayment.<sup>6</sup> The Commission has codified this rule in 807 KAR 5:006, Section 14(f), which provides:

A utility may terminate service at a point of delivery for nonpayment of charges incurred for utility service at that point of delivery; however, no utility shall terminate service to any customer for nonpayment of bills for any tariffed charge without first having mailed or otherwise delivered an advance termination notice which complies with the requirements of Section 13(5) of this administrative regulation.

1. Termination notice requirements for electric or gas service. Each electric or gas utility proposing to terminate customer service for nonpayment shall mail or otherwise deliver to that customer ten (10) days' written notice of intent to terminate. Under no circumstances shall service be

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<sup>4</sup> Application at 3. The amount of the arrears ranges from \$1,817 to \$7,384.

<sup>5</sup> Insurance Services Office (ISO) provides statistical, actuarial, and underwriting information for the property/casualty insurance and risk management industries. The company gathers premium, claim, and loss data that is filed with state regulators; the data is used to evaluate the price of insurance in each state. See [http://www.hoovers.com/iso/--ID\\_\\_59977--/free-co-profile.xhtml](http://www.hoovers.com/iso/--ID__59977--/free-co-profile.xhtml) (last visited Feb. 17, 2008)

<sup>6</sup> See 78 Am. Jur. 2d *Waterworks and Water Companies* § 65 (2007); 64 Am. Jur. 2d *Public Utilities* § 48 (2007); See also *Warfield Natural Gas Co. v. Clark Adm'x*, 257 Ky. 724, 79 S.W.2d 21 (1934) *Kentucky Utilities Co. v. Warren Ellison Café*, 231 Ky. 558, 21 S.W.2d 976 (1929).

terminated before twenty-seven (27) days after the mailing date of the original unpaid bill. The termination notice to residential customers shall include written notification to the customer of the existence of local, state and federal programs providing for the payment of utility bills under certain conditions, and of the address and telephone number of the Department for Social Insurance of the Cabinet for Health and Family Services to contact for possible assistance.

2. Termination notice requirements for water, sewer, or telephone service. Each water, sewer, or telephone utility proposing to terminate customer service for nonpayment shall mail or otherwise deliver to that customer five (5) days' written notice of intent to terminate. Under no circumstances shall service be terminated before twenty (20) days after the mailing date of the original unpaid bill.

3. The termination notice requirements of this subsection shall not apply if termination notice requirements to a particular customer or customers are otherwise dictated by the terms of a special contract between the utility and customer which has been approved by the commission.

Having considered the petition and being otherwise sufficiently advised, the Commission finds a formal proceeding authorizing service disconnections in this case is not required. Kentucky-American may disconnect the service of the customers in question by complying with 807 KAR 5:006, Section 14.<sup>7</sup> We further find that Kentucky-American's efforts to notify these customers' insurers and local fire departments of its proposed action are prudent and reasonable and should be considered as the better practice for all water utilities that intend to discontinue a customer's fire protection service for nonpayment.

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<sup>7</sup> See Case No. 1993-00296, The Application of John Allen, Trustee, with Burl Wells Spurlock, Betty H. Minix and Patsy Wright, to Discontinue Service to Certain Customers (Ky. PSC Sept. 30, 1993).


IT IS THEREFORE ORDERED that:

1. Kentucky-American's petition is denied as moot.
2. This matter is closed and removed from the Commission's docket.

Done at Frankfort, Kentucky, this 28<sup>th</sup> day of February, 2008.

By the Commission

ATTEST:

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the end, positioned above the title 'Executive Director'.

Executive Director



January 17, 2011

**VIA EMAIL**

Mr. J. P. Cline, III  
Cline Law Office  
PO Box 2220  
205 North 20<sup>th</sup> Street  
Middlesboro, KY 40965

**Ambleside Water Hydrants**

Dear Mr. Cline,

Your December 22 letter concerning the above matter has been referred to me. Please refer to my letter to you of December 11, 2008 on the above subject. As noted in that letter, Water Service Corp. of Kentucky (WSCKY) is a regulated utility that has been authorized by the Public Service Commission of Kentucky to provide water services to the City of Middlesboro and other areas, including the Ambleside subdivision. The Commission also approves WSCKY's tariff for water services, and our approved tariff includes the hydrant fees referred to in your letter.

Your client, Ambleside, Ltd., the developer of the Ambleside subdivision, paid the hydrant fees for many years until terminating those payments without notice in 2008 – around the time the subdivision was built out. The past due balance for hydrant fees is now \$9,395.40, not including the amount of your client's next bill, which will be issued January 24. Please advise your client that WSCKY will commence action to collect past due balance unless it is paid on or before January 24.

My 2008 letter also advised you that I represent WSCKY and provided my contact information, which is also set forth below and in my covering email. Please direct all future communications to me rather than attempting to contact my client directly.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Stover", with a stylized flourish extending to the right.

John Stover  
Vice President and General Counsel

## Steve M. Lubertozzi

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**From:** Bill Sowell  
**Sent:** Wednesday, April 13, 2011 9:25 AM  
**To:** John Stover  
**Cc:** Don Sudduth; John Hoy  
**Subject:** RE: Ambleside, Ltd., a customer of Water Service Corp. of Kentucky (WSCKY) - TAG Engagement

**Sensitivity:** Confidential

John,  
According to our Collection Agency (TAG) in the March report, they have now gone through a name change to Pioneer Holdings (no details on how this was legally done) and are still being pursued. The Past Due Balance was updated with TAG on April 6<sup>th</sup> to \$10,208.

I will request an account update from TAG today...along with requesting more detail on what they have been able to learn about transaction between Ambleside and Pioneer Holdings.

Bill

G. W. (Bill) Sowell  
Utilities, Inc.  
Mgr., Corp. Services  
Phone (847) 897-6501  
Internal Network - Dial 3322  
Cell (803) 600-9086

---

**From:** John Stover  
**Sent:** Wednesday, April 13, 2011 9:58 AM  
**To:** George W. Sowell  
**Cc:** Don Sudduth; John Hoy  
**Subject:** RE: Ambleside, Ltd., a customer of Water Service Corp. of Kentucky (WSCKY) - TAG Engagement  
**Sensitivity:** Confidential

Bill,

What's the status of our collection effort on this?

John

~~~~~  
John Stover  
Vice President and General Counsel  
Utilities, Inc.  
Phone: 847-498-6440  
Email: [jrstover@uiwater.com](mailto:jrstover@uiwater.com)

**COMMUNICATION SUBJECT TO THE ATTORNEY-CLIENT PRIVILEGE. DO NOT FORWARD WITHOUT PERMISSION.**

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---

**From:** George W. Sowell  
**Sent:** Tuesday, February 08, 2011 10:30 AM  
**To:** John Stover  
**Cc:** Don Sudduth  
**Subject:** FW: Ambleside, Ltd., a customer of Water Service Corp. of Kentucky (WSCKY) - TAG Engagement  
**Importance:** High  
**Sensitivity:** Confidential

Hi John,

For your files...see below:

Ambleside was sent to our collection agency yesterday. In the event there is a counter claim, we have the right to withdraw the account under section 11 of the agreement with TAG.

Bill

-----  
*G. W. (Bill) Sowell*  
Utilities, Inc  
Mgr., Corp. Services  
Phone (847) 897-6501  
Internal Network - Dial 3322  
Cell (803) 600-9086

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**From:** George W. Sowell  
**Sent:** Monday, February 07, 2011 11:23 AM  
**To:** Mike J. Korte  
**Cc:** Don Sudduth; Amber Daffer; Andrea Lybarger  
**Subject:** Ambleside, Ltd., a customer of Water Service Corp. of Kentucky (WSCKY) - TAG Engagement  
**Importance:** High  
**Sensitivity:** Confidential

Mike,

Per our discussions last week, Ambleside is an active commercial account of Utilities, Inc. that we are placing for collection. Ambleside is a unique case in that they are being charged for water availability for fire protection (charged per fire hydrant each month) and therefore UI cannot simply stop service. Since the account will remain active, we can only demand the past due balance, which will be maintained monthly by UI...in other words this balance will vary based on the monthly aging of each invoice. We further discussed that this account would receive a higher level of collection effort...as opposed to just being put on the auto-dialer. Any questions regarding the initial set up of this account should be directed to me. Amber Daffer will be contact point going forward after initial set-up.

During Uis collection process, Ambleside did engage an attorney...please see reply of January 17, 2011 from UIs General Counsel to their attorney.

Per your email of February 3<sup>rd</sup>, TAG has set up a client code for "active accounts", with Ambleside being the first account to be placed under this code.

## AMBLESIDE ACCOUNT DETAIL

**Customer Name:**

Ambleside

**Customer Account Number:**

[REDACTED]

**Account Status:**

Active

**Amount Submitted for Collection:**

\$9,395.40 (Past Due Balance only)

**Frequency of Past Due Balance update by UI:**

Monthly

**Last payment on Account:**

November 11, 2008

**Last Invoice Date:**

January 25, 2011

**Phone Number:**

(606) 248-6600 (Receptionist)

**Mail to Address:**

Ambleside

[REDACTED]

Please let me know if you require further information to set this in motion. This email assumes that you will coordinate getting this set up in your system, in lieu of Amber inputting the data.

Regards,  
Bill

-----  
*G. W. (Bill) Sowell*  
Utilities, Inc  
Mgr., Corp. Services  
Phone (847) 897-6501  
Internal Network - Dial 3322  
Cell (803) 600-9086

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Steven L. Beshear  
Governor

Leonard K. Peters  
Secretary  
Energy and Environment Cabinet

Commonwealth of Kentucky  
**Public Service Commission**  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, Kentucky 40602-0615  
Telephone: (502) 564-3940  
Fax: (502) 564-3460  
psc.ky.gov

David L. Armstrong  
Chairman

James W. Gardner  
Vice Chairman

Charles R. Borders  
Commissioner

April 19, 2011

J.P. Cline III, Esq.  
Cline Law Office  
Post Office Box 2220  
Middlesboro, Kentucky 40965

**PSC STAFF OPINION 2011-007**

Re: Ambleside, Ltd.

Dear Mr. Cline:

Commission Staff acknowledges receipt of your letter of February 24, 2011 in which you request on behalf of Ambleside, Ltd. ("Ambleside") an opinion regarding its responsibility for fees that are assessed for fire hydrants that serve the Ambleside Subdivision in Bell County, Kentucky.

At the outset, Commission Staff notes that it has previously addressed a similar question involving the provision of fire protection service to the Ambleside Subdivision in PSC Staff Opinion 2010-016. A copy of this opinion is enclosed for your reference.

Based upon your letter of February 24, 2011 and its review of PSC Staff Opinion 2010-016, Commission Staff understands the facts as follows:

Water Service Corporation of Kentucky, Inc. ("WCKY"), a subsidiary of Utilities, Inc., owns and operates facilities that distribute water to and for the public in and around Middlesboro, Kentucky.

Ambleside Subdivision is a subdivision located in the unincorporated area of Bell County, Kentucky. WCKY provides water service to Ambleside Subdivision.

Ambleside, Ltd. ("Ambleside"), a Kentucky for-profit corporation organized in 1981,<sup>1</sup> began development of the Ambleside Subdivision in 1981. It procured the design and

<sup>1</sup> Notwithstanding statements in your letter of February 24, 2011 that Ambleside is a limited partnership, the records of the Office of the Kentucky Secretary of State indicate that Ambleside is a for-profit corporation and not a limited partnership. See <https://app.sos.ky.gov/ftshow/%28S%283ogwiw45cw24v3551hwmgt55%29%29/default.aspx?path=ftsearch&id=0153097&ct=09&cs=9999> (last visited April 9, 2011).

installation of the water distribution system that serves the subdivision. This system, which included fire hydrants, was subsequently donated to WSKY's predecessor in interest<sup>2</sup> and is located on county road rights-of-way that Ambleside originally dedicated as public roads.

Twenty-one hydrants are located in Ambleside Subdivision on county-owned and maintained roads. WSKY owns and maintains these hydrants. Three times a year it flushes and inspects the hydrants. It tests the flow and paints the hydrants every five years. WSKY is responsible for replacing damaged and inoperable hydrants.

Under the terms of its filed rate schedules, WSKY assesses a monthly fee of \$4.30 for service to public fire hydrants that the city of Middlesboro owns. It assesses monthly fee of \$19.35 for private hydrants and sprinkler systems. A copy of the pertinent tariff sheet is enclosed.

Ambleside has assumed responsibility for the charges associated with the fire hydrants in the Ambleside Subdivision since the subdivision's inception. In November 2008, contending that all fire hydrants were located on Bell County owned right-of-way and therefore did not constitute private hydrants, Ambleside ceased paying the charges. It takes the position that "if these fire hydrants are located on a public right-of-way, then they not qualify as 'private hydrants', and WSK[Y] must look to Bell County, Kentucky for payment of any applicable hydrant fee at the substantially reduced rate applicable for municipal hydrants."

No evidence exists of a contractual relationship between WSKY and Bell County Fiscal Court regarding the provision of fire protection service or the provision of fire

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<sup>2</sup> Until 1985 Kentucky Water Service Company, Inc. owned and operated the water distribution system that currently serves Middlesboro, Kentucky. Aqua Corporation subsequently acquired control of ownership of the assets of Kentucky Water Service Company. See Case No. 9392, *Application of the Aqua Corporation for Authority to Acquire One Hundred Percent (100%) of the Common Stock of Kentucky Water Service Company, Inc.* (Ky. PSC Sept. 19, 1985); Case No. 9431, *Joint Filing Seeking Authority for Kentucky Water Service Company, Inc. to Transfer Its Water Plants Located at Middlesboro and Clinton to the Aqua Corporation* (Ky. PSC Nov. 15, 1985). In 1998, Utilities of Kentucky, Inc. acquired Aqua Corporation's stock. Case No. 98-291, *The Application of Aqua/KWS, Inc. For Approval of Transfer of Stock to Utilities of Kentucky, Inc.* (Ky. PSC July 27, 1998). In 2002 WSKY acquired the assets of Aqua Corporation. Case No. 2002-00142, *Joint Application of Aqua/KWS, Inc., Utilities of Kentucky, Inc., and Water Service Corporation of Kentucky for Approval of the Transfer of the Ownership of the Assets of Aqua/KWS, Inc. and Utilities of Kentucky, Inc. to Water Service Corporation of Kentucky Pursuant to the Provisions of KRS 278.020(4) and (5) and 807 KAR 5:001(8)* (Ky. PSC June 14, 2002).

hydrants nor is there any evidence of such relationship between Ambleside and Bell County Fiscal Court.

Your letter presents the following question: May WSCKY lawfully assess and bill Ambleside for fire hydrants that are located on public road right-of-way that county government owns?

Water utilities generally have no obligation to provide fire protection service unless it expressly assumes that obligation by contract or is expressly directed by statute or an appropriate regulatory authority.<sup>3</sup> No Kentucky statute expressly requires WSCKY to provide fire hydrants or to make fire protection service available to its customers. The Public Service Commission has permitted a large number of water utilities to disclaim in their filed rate schedules any obligation to provide fire protection service.<sup>4</sup> A survey of water utilities indicates that only 38 percent of all water utilities subject to Public Service Commission jurisdiction had established rules for fire hydrant service and suggests that most water utilities in the Commonwealth that are subject to Public Service Commission jurisdiction do not provide such service.<sup>5</sup>

The Public Service Commission's regulations are relatively silent on the provision of fire protection service. The only reference to such service is found at 807 KAR 5:066, Section 10(2)(b). This rule establishes the minimum standards under which a water utility is authorized to install fire hydrants on its distribution system. It further provides:

The location, installation, and the responsibility for maintenance of fire hydrants, public and private fire protection facilities, connecting mains, and their ownership may be subject to negotiation between the utility and the applicant. Fire hydrants and public and private fire protection facilities shall be installed as required by the utility and if owned by the utility shall be subject to any conditions the commission may impose, based upon the compensation received for this service.

In the absence of any specific statutory or regulatory provisions on fire protection service, any review of WSCKY's provision of fire protection service must refer to WSCKY's filed rate schedules. KRS 278.030(2) provides that "[e]very utility shall

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<sup>3</sup> 94 C.J.S *Waters* § 744 (2011).

<sup>4</sup> See Administrative Case No. 385, *An Investigation Into Fees For Fire Protection Services* (Ky. PSC Dec. 7, 2001) at 8 (noting that 44 percent of all water utilities responding to a Commission survey do not provide any fire protection services). In 2001 a Commission Staff review of the filed rate schedules found that 45 percent of all water utilities expressly disclaimed any responsibility for fire protection services. See Carryn Lee and Gerald Wuetcher, Final Staff Report on Water Utility Responses to Commission's Interrogatories (filed Dec. 7, 2001) ("Final Report"), Administrative Case No. 385, *An Investigation Into Fees For Fire Protection Services* (Ky. PSC), available at [ftp://ftp.psc.state.ky.us/order\\_vault/Orders\\_2001/20000385\\_12072001apx\\_staffreport.pdf](ftp://ftp.psc.state.ky.us/order_vault/Orders_2001/20000385_12072001apx_staffreport.pdf).

<sup>5</sup> Final Report at 6.

furnish adequate, efficient and reasonable service, and may establish reasonable rules governing the conduct of its business and the conditions under which it shall be required to render service." KRS 278.160(2) provides that "[n]o utility shall charge, demand, collect, or receive from any person a greater or less compensation for any service rendered or to be rendered than that prescribed in its filed schedules, and no person shall receive any service from any utility for a compensation greater or less than that prescribed in such schedules." The Public Service Commission has held that a utility may not provide a service unless such service is set forth in its filed rate schedule and may only provide that service under the terms set forth in the filed rate schedule.<sup>6</sup>

WSCKY's filed rate schedules only briefly address fire protection service. They provide for three types of service: (1) private hydrants<sup>7</sup> or sprinkler systems; (2) Clinton municipally owned hydrants; and (3) Middlesboro municipally owned hydrants.<sup>8</sup> They further restate the Public Service Commission's rule regarding fire hydrants.<sup>9</sup> They do not provide a separate rate classification for local or county governments other than the cities of Middlesboro and Clinton. The filed rate schedules make no provision for imposing any fees for fire hydrant on any person other than the applicant for the service.

Based upon its review of the WSCKY's filed rate schedules, Commission Staff is unable to find any basis to support Ambleside's contention that Bell County Fiscal Court is the responsible party for private fire hydrant service that WSCKY current provides to the Ambleside Subdivision. The existing evidence shows that Ambleside requested the service and its development enjoys the benefits of that service. There is no evidence to suggest that Bell County Fiscal Court has requested or applied for such service. No provision in WSCKY's tariff would permit the imputation of the fees for such service to Bell County Fiscal Court. Assuming *arguendo* that a basis to impose financial responsibility upon Bell County Fiscal Court existed, the water utility's rate schedule would require the Bell County Fiscal Court to pay a monthly private fire hydrant rate of \$19.35 per hydrant, not the lower rate as suggested in your letter.

Commission Staff is of the opinion that the location of the private fire hydrants on public road right-of-ways is irrelevant to determining responsibility for the cost of private

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<sup>6</sup> See, e.g., Case No. 90-108, *Americoal Corp. v. Boone County Water and Sewer Dist.* (Ky. PSC Jan. 16, 1992).

<sup>7</sup> WSCKY does not define private fire hydrant in its tariff. Commission Staff has been unable to locate a definition for such hydrants in the Commission's regulations or in any Kentucky statute. In discussing private hydrants, one state utility commission offered the following definition: "They are called private fire hydrants rather than public fire hydrants because they are installed at the request of and at the expense of the company's customers, whose premises are protected by the adjacent location of the fire hydrant." *Re Village Water Co. of Simsbury*, 81 PUR NS 148, 159 (Conn. PUC 1949).

<sup>8</sup> WSCKY Tariff, P.S.C.KY. No. 3, Sheet 41. The filed rate schedules also provide for advanced billing for private fire service and the provision of free water service to fire departments for fire protection and training purposes.

<sup>9</sup> *Id.* at Sheets No. 17-18.

fire hydrant service to the Ambleside Subdivision. KRS 416.140(1)<sup>10</sup> granted WSKY and its predecessors in interest the right to construct and maintain facilities in the public road right-of-way. Bell County Fiscal Court's acquisition of the ownership of the public road did not create an interest in any water utility facilities located on the right-of-way nor did it impose any obligation to pay for services rendered by the water utility. Ambleside has provided Commission Staff no documentary evidence to suggest that Bell County Fiscal Court's assumption of responsibility for fire protection service to the Ambleside Subdivision was an express condition to the dedication of the land as a public roadway.

Locating a fire hydrant on a public road right-of-way is similar to locating a private water meter on such a right-of-way. A fire hydrant and a water meter are water utility equipment. Locating a water meter on a county road right-of-way to establish service for a customer does not render the county government responsible for the cost of the water service to the private customer. To suggest otherwise would have significant consequences for many county governments and rural water utilities.

While KRS 67.083(3)(u) authorizes county fiscal courts to provide for fire protection, no statute expressly requires fiscal courts to provide fire protection services. No evidence has been provided to Commission Staff that suggests that Bell County Fiscal Court expressly agreed to assume financial responsibility for the private fire hydrants or required the installation of the fire hydrants in question. Absent Bell County Fiscal Court's expressed or implied consent or a county ordinance placing the obligation for fire protection services on county governments, Commission Staff is of the opinion that WSKY may not impose on or impute to Bell County Fiscal Court financial responsibility for fire protection services provided to the Ambleside Subdivision.<sup>11</sup>

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<sup>10</sup>


Subject to the provisions of subsections (2) and (3) of this section, any person authorized under the laws of this state to conduct the business of producing or supplying water, electricity, gas or gasoline for purposes of light, heat, domestic use or power, or who is engaged in the business of the transmission or sale of water, electricity, gas or gasoline for such purposes, the aforesaid businesses being for a public purpose, may construct and maintain transmission or distribution lines, including placing and maintenance of pipes, poles, wires, crossarms and all other equipment incident thereto, for use in the transmission and sale of such water, electricity, gas or gasoline under, on, along or over any right-of-way used as a state highway, county road, public way or dedicated road outside the limits of a city, and over, under or across any of the waters of this state outside the limits of a city, and may construct and maintain along any right-of-way used for purposes of such state highway or county road all erections and appliances that are necessary to transform, convert and apply such water, electricity, gas or gasoline to the public purposes of lighting, heat, domestic use or power and to distribute and deliver it to the consumers.

<sup>11</sup> See *Sheridan Acres Water Co. v. Douglas County*, 688 P.2d 297 (Nev. 1984) (holding that county government is responsible for fees related to fire hydrants only when it has requested hydrants or requires fire hydrants to be installed); *Suffolk County Water Auth. v. Bd. of Fire Comm'rs, Centerport Fire Dist.*, 449 N.E.2d 1269 (N.Y. 1983); *Arcade County Water Dist. v. Arcade Fire Dist.*, 85 Cal.Rptr. 737 (Cal.App. 1970).

Ambleside's continued refusal to pay WCKY for fire protection services may result in the termination of such service. As noted in PSC Staff Opinion 2010-016, Public Service Commission regulations permit WCKY to discontinue water service for any failure to pay outstanding fees for private hydrant services.<sup>12</sup> Commission Staff respectfully recommends that, should Ambleside maintain its current position of refusing to pay such fees, it consider discussions with Bell County Fiscal Court regarding its assumption of responsibility for such services or the formation of a fire protection district<sup>13</sup> that could assume the responsibility for private hydrant fees.

This letter represents Commission Staff's interpretation of the law as applied to the facts presented. This opinion is advisory in nature and not binding on the Commission should the issues herein be formally presented for Commission resolution. Questions concerning this opinion should be directed to Gerald Wuetcher, Executive Advisor/Attorney, at (502) 564-3940, Extension 259.

Sincerely,



Jeff Derouen  
Executive Director

Enclosures

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<sup>12</sup> See also Case No. 2007-00450, *Petition of Kentucky-American Water Co. for Permission and Authorization to Disconnect Customers for Non-Payment of Fire Service Charges* (Ky. PSC Feb. 28, 2008).

<sup>13</sup> See KRS 75.010-.270.

**From:** Bill Sowell  
**Sent:** Friday, April 22, 2011 9:53 AM  
**To:** John Stover  
**Cc:** Don Sudduth; John Hoy  
**Subject:** RE: Ambleside

John,  
Just an update from our Collection Agency's (TAG) client files on Ambleside. On April 7<sup>th</sup> Robert Vaughn had this to say to TAG:

***"ROBERT VAUGHN: HE CLAIMS THAT CLIENT ILLGLY BILLED HIM, HE WILL NOT PAY, HAS GONE TO THE CHAIRMAN OF THE PUBLIC SERV COMMISSION AND THEY ALL FAMILAR WITH THIS BILL, HAD RETAINED ATTRNY PETE CLINE PH# 606-248-8001..CAN CONTACT HIM."***

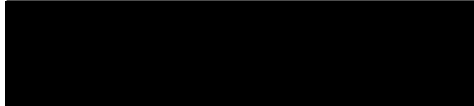
TAG has made several attempts to contact Cline, but as of April 19<sup>th</sup>, he has not returned any of their calls.

Will keep you updated as TAG records activity.

Bill

G. W. (Bill) Sowell  
Utilities, Inc.  
Mgr., Corp. Services  
Phone (847) 897-6501  
Internal Network - Dial 3322  
Cell (803) 600-9086

Ambleside, LTD



May 1, 2011

James Leonard, Manager  
Water Service Corporation  
Of Kentucky  
1221 W Cumberland Avenue  
Middlesboro, KY 40965

Dear Mr. Leonard:

Your company insists that Ambleside is responsible for paying a monthly rental on fire hydrants for which you provide hydrant flushing three times per year along with flow testing and painting every five years. For that service you charge us in excess of \$4800.00 annually.

We do not feel that we obligated ourselves to this **perpetual** expense when we started the Ambleside development thirty (30) years ago. Over the years Ambleside has paid all capital costs while providing the water company over 200 customers.

This letter directs you to **immediately** cease providing the hydrant service described in the first paragraph. Since your hydrants are on county right of way, you may want them to pay for the service. OR, since you do not charge for the hydrant service to others who have hydrants outside the City of Middlesboro, you should eliminate the charge.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert W. Vaughn", with a long horizontal line extending to the right.

Robert W. Vaughn  
President

Cc: Judge Albey Brock  
Attorney J.P. Cline III





May 2, 2012

**VIA EMAIL**

Mr. J. P. Cline, III  
Cline Law Office  
PO Box 2220  
205 North 20<sup>th</sup> Street  
Middlesboro, KY 40965

**Ambleside Water Hydrants**

Dear Mr. Cline,

I am in receipt of your April 16 and April 25 letters concerning the above matter. If you have read either of my prior letters to you, which were dated December 11, 2008 and January 17, 2011, then you would know that the right of Water Service Corp. of Kentucky (WSCKY) to charge the hydrant fees referred to in your letter has long been established under the WSCKY tariff. That tariff was duly approved and authorized by the Public Service Commission of Kentucky. As I explained to you in 2008, the fact that WSCKY's hydrants are located on county owned and maintained public roads is irrelevant to WSCKY's right to charge hydrant fees under its approved tariff. I have previously sent you a copy of the tariff, and its application to the Ambleside hydrants is clear.

Accordingly, your client, Ambleside, Ltd., is not entitled to a refund of the hydrant fees it paid until terminating those payments without notice in 2008. Furthermore, Ambleside, Ltd. is liable to pay the past due balance for unpaid hydrant fees since 2008, which balance is now \$15,931.00. Please advise your client that WSCKY will commence action to collect past due balance unless it is paid in full on or before May 31, 2012.

I would appreciate it if you would review this letter – and my prior letters – with your client and responding to this demand for payment of your client's past due account.

Very truly yours,

A handwritten signature in black ink, appearing to be "J. Stover", written in a cursive style.

John Stover  
Vice President and General Counsel

**CLINE LAW OFFICE**  
P.O. BOX 2220  
205 NORTH 20TH STREET  
MIDDLESBORO, KENTUCKY 40965  
website: [jpclinelawfirm.com](http://jpclinelawfirm.com)

RECEIVED  
MAY 16 2012

**J. P. CLINE III**  
(email: [pete@jpclinelaw.com](mailto:pete@jpclinelaw.com))

1-606-248-8001 (Office)  
1-606-248-8049 (Fax)

May 10, 2012

Mr. John Stover  
Vice President and General Counsel  
Utilities, Inc.  
2335 Sanders Road  
Northbrook, Illinois 60062

Re: Ambleside Water Hydrants

Dear Mr. Stover:

I acknowledge receipt of your May 7, 2012 correspondence which references your letters of December 11, 2008 and January 17, 2011 as being responsive to my client's position that Utilities, Inc. should be billing Bell County, Kentucky for any fire hydrant charges. As you requested, I again reviewed 2008 and 2011 letters seeking an answer to this issue.

Your January 17, 2011 correspondence does not substantively address the issue in any way. Your December 11, 2008 letter simply establishes the right of Utilities, Inc. to bill for hydrant services. It does not substantively address whether Utilities, Inc. should be billing Ambleside, Ltd. or Bell County, Kentucky. Ambleside does not question the right of Utilities, Inc. to maintain the hydrants on Bell County right-of-way nor the fact that the hydrants may be subject to the applicable tariff. Ambleside, in good faith, merely questions the appropriateness of continued billings to Ambleside, Ltd. when the subject fire hydrants are not located on Subdivision property.

Accordingly, Ambleside continues to maintain that Utilities, Inc. should be billing Bell County, Kentucky for any applicable and appropriate fire hydrant fees rather than Ambleside, Ltd.

Mr. John Stover

May 10, 2010

Page 2

Finally, I enclose copy of May 1, 2011 correspondence from Ambleside, Ltd. directing Water Service Corporation of Kentucky to immediately cease providing hydrant flushing services in order to terminate the continuation of billing for those services. To my client's knowledge, that notice continues to be disregarded. As this notice letter indicates, Utilities, Inc. may elect to bill Bell County, Kentucky for these flushing services in its discretion.

I trust this clarifies our position with regard to this continuing dispute, and I remain,

Sincerely yours,



J. P. CLINE III

Enclosure

cc: Robert W. Vaughn  
Michael Bowling

h:\msoffice\winword\document\romell\v&mamblesidedispute.doc



July 25, 2016

AMBLESIDE

[Redacted]

Account Number: [Redacted]

Dear AMBLESIDE:

Our records indicate that there is an outstanding balance of \$36805.84 on your water and/or wastewater account. If you have already mailed your payment, we apologize for any inconvenience and thank you for your payment.

If your payment has not been mailed, please send in the full outstanding balance today. If we do not hear from you within 10 days of the date on this letter, your service may be severed without additional notification. For your service to be reinstated, the outstanding balance and all applicable fees must be paid in full.

For your convenience, charge/debit card or electronic check payments may be made through <https://utilitiesinc.firstbilling.com> or by calling First Billing Services at 888-562-3451. There is a convenience fee for this service. You may also visit our website at [www.uiwater.com](http://www.uiwater.com) for more information. Returned payments will be subject to the maximum fees allowed by your state.

We thank you for your prompt attention to this matter.

Collections Department  
Utilities, Inc.

REG DISCON

A Utilities Inc Company: Water Service Corp of Kentucky  
PO Box 160609 Altamonte Springs FL 32716-0609 P:(844) 310-5556 www.uiwater.com



Account Number: [Redacted]  
Please Pay: **\$36,805.84**

Amount Paid

AMBLESIDE

[Redacted]

Water Service Corp of Kentucky  
PO Box 11025  
Lewiston ME 04243-9476



October 30, 2016

AMBLESIDE

[Redacted]

Account Number: [Redacted]

Dear AMBLESIDE:

Our records indicate that there is an outstanding balance of \$38817.85 on your water and/or wastewater account. If you have already mailed your payment, we apologize for any inconvenience and thank you for your payment.

If your payment has not been mailed, please send in the full outstanding balance today. If we do not hear from you within 10 days of the date on this letter, your service may be severed without additional notification. For your service to be reinstated, the outstanding balance and all applicable fees must be paid in full.

For your convenience, charge/debit card or electronic check payments may be made through <https://utilitiesinc.firstbilling.com> or by calling First Billing Services at 888-562-3451. There is a convenience fee for this service. You may also visit our website at [www.uiwater.com](http://www.uiwater.com) for more information. Returned payments will be subject to the maximum fees allowed by your state.

We thank you for your prompt attention to this matter.

Collections Department  
Utilities, Inc.

REG DISCON

A Utilities Inc Company: Water Service Corp of Kentucky  
PO Box 160609 Altamonte Springs FL 32716-0609 P:(844) 310-5556 [www.uiwater.com](http://www.uiwater.com)



Account Number: [Redacted]  
Please Pay: **\$38,817.85**

Amount Paid

AMBLESIDE

[Redacted]

Water Service Corp of Kentucky  
PO Box 11025  
Lewiston ME 04243-9476



February 26, 2017

AMBLESIDE

[Redacted]

Account Number: [Redacted]

Dear AMBLESIDE:

Our records indicate that there is an outstanding balance of \$40348.75 on your water and/or wastewater account. If you have already mailed your payment, we apologize for any inconvenience and thank you for your payment.

If your payment has not been mailed, please send in the full outstanding balance today. If we do not hear from you within 10 days of the date on this letter, your service may be severed without additional notification. For your service to be reinstated, the outstanding balance and all applicable fees must be paid in full.

For your convenience, charge/debit card or electronic check payments may be made through <https://utilitiesinc.firstbilling.com> or by calling First Billing Services at 888-562-3451. There is a convenience fee for this service. You may also visit our website at [www.uiwater.com](http://www.uiwater.com) for more information. Returned payments will be subject to the maximum fees allowed by your state.

We thank you for your prompt attention to this matter.

Collections Department  
Water Service Corp of Kentucky

REG DISCON

A Utilities Inc Company: Water Service Corp of Kentucky  
PO Box 160609 Altamonte Springs FL 32716 P:(844) 310-5556 [www.uiwater.com](http://www.uiwater.com)



Account Number: [Redacted]  
Please Pay: **\$40,348.75**

Amount Paid

AMBLESIDE

[Redacted]

Water Service Corp of Kentucky  
PO BOX 11025  
LEWISTON ME 04243-9476



June 25, 2017

AMBLESIDE

[Redacted]

Account Number: [Redacted]

Dear AMBLESIDE:

Our records indicate that there is an outstanding balance of \$42900.25 on your water and/or wastewater account. If you have already mailed your payment, we apologize for any inconvenience and thank you for your payment.

If your payment has not been mailed, please send in the full outstanding balance today. If we do not hear from you within 10 days of the date on this letter, your service may be severed without additional notification. For your service to be reinstated, the outstanding balance and all applicable fees must be paid in full.

For your convenience, charge/debit card or electronic check payments may be made through <https://utilitiesinc.firstbilling.com> or by calling First Billing Services at 888-562-3451. There is a convenience fee for this service. You may also visit our website at [www.uiwater.com](http://www.uiwater.com) for more information. Returned payments will be subject to the maximum fees allowed by your state.

We thank you for your prompt attention to this matter.

Collections Department  
Water Service Corp of Kentucky

REG DISCON

Water Service Corp of Kentucky

PO Box 160609 Altamonte Springs FL 32716 P:(844) 310-5556 www.uiwater.com



Account Number: [Redacted]  
Please Pay: **\$42,900.25**

Amount Paid

AMBLESIDE

[Redacted]

Water Service Corp of Kentucky  
PO BOX 11025  
LEWISTON ME 04243-9476



October 29, 2017

AMBLESIDE

Account Number: [REDACTED]

Dear AMBLESIDE:

Our records indicate that there is an outstanding balance of \$44941.45 on your water and/or wastewater account. If you have already mailed your payment, we apologize for any inconvenience and thank you for your payment.

If your payment has not been mailed, please send in the full outstanding balance today. If we do not hear from you within 10 days of the date on this letter, your service may be severed without additional notification. For your service to be reinstated, the outstanding balance and all applicable fees must be paid in full.

For your convenience, charge/debit card or electronic check payments may be made through <https://utilitiesinc.firstbilling.com> or by calling First Billing Services at 888-562-3451. There is a convenience fee for this service. You may also visit our website at [www.uiwater.com](http://www.uiwater.com) for more information. Returned payments will be subject to the maximum fees allowed by your state.

We thank you for your prompt attention to this matter.

Collections Department  
Water Service Corp of Kentucky

REG DISCON

Water Service Corp of Kentucky

PO Box 160609 Altamonte Springs FL 32716 P:(844) 310-5556 www.uiwater.com



Account Number: [REDACTED]  
Please Pay: **\$44,941.45**

Amount Paid

AMBLESIDE

[REDACTED]

Water Service Corp of Kentucky  
PO BOX 11025  
LEWISTON ME 04243-9476





January 29, 2018

AMBLESIDE

[Redacted]

Account Number: [Redacted]

Dear AMBLESIDE:

Our records indicate that there is an outstanding balance of \$45962.05 on your water and/or wastewater account. If you have already mailed your payment, we apologize for any inconvenience and thank you for your payment.

If your payment has not been mailed, please send in the full outstanding balance today. If we do not hear from you within 10 days of the date on this letter, your service may be severed without additional notification. For your service to be reinstated, the outstanding balance and all applicable fees must be paid in full.

For your convenience, charge/debit card or electronic check payments may be made through <https://utilitiesinc.firstbilling.com> or by calling First Billing Services at 888-562-3451. There is a convenience fee for this service. You may also visit our website at [www.uiwater.com](http://www.uiwater.com) for more information. Returned payments will be subject to the maximum fees allowed by your state.

We thank you for your prompt attention to this matter.

Collections Department  
Water Service Corp of Kentucky

REG DISCON

Water Service Corp of Kentucky

PO Box 160609 Altamonte Springs FL 32716 P:(844) 310-5556 www.uiwater.com



Account Number: [Redacted]  
Please Pay: **\$45,962.05**

Amount Paid

AMBLESIDE

[Redacted]

Water Service Corp of Kentucky  
PO BOX 11025  
LEWISTON ME 04243-9476



May 27, 2018

AMBLESIDE

[Redacted]

Account Number: [Redacted]

Dear AMBLESIDE:

Our records indicate that there is an outstanding balance of \$48513.55 on your water and/or wastewater account. If you have already mailed your payment, we apologize for any inconvenience and thank you for your payment.

If your payment has not been mailed, please send in the full outstanding balance today. If we do not hear from you within 10 days of the date on this letter, your service may be severed without additional notification. For your service to be reinstated, the outstanding balance and all applicable fees must be paid in full.

For your convenience, charge/debit card or electronic check payments may be made through <https://utilitiesinc.firstbilling.com> or by calling First Billing Services at 888-562-3451. There is a convenience fee for this service. You may also visit our website at [www.uiwater.com](http://www.uiwater.com) for more information. Returned payments will be subject to the maximum fees allowed by your state.

We thank you for your prompt attention to this matter.

Collections Department  
Water Service Corp of Kentucky

REG DISCON

Water Service Corp of Kentucky

PO Box 160609 Altamonte Springs FL 32716 P:(844) 310-5556 www.uiwater.com



Account Number: [Redacted]  
Please Pay: **\$48,513.55**

Amount Paid

AMBLESIDE

[Redacted]

Water Service Corp of Kentucky  
PO BOX 11025  
LEWISTON ME 04243-9476



September 23, 2018

AMBLESIDE

Account Number: [REDACTED]

Dear AMBLESIDE:

Our records indicate that there is an outstanding balance of \$50044.45 on your water and/or wastewater account. If you have already mailed your payment, we apologize for any inconvenience and thank you for your payment.

If your payment has not been mailed, please send in the full outstanding balance today. If we do not hear from you within 10 days of the date on this letter, your service may be severed without additional notification. For your service to be reinstated, the outstanding balance and all applicable fees must be paid in full.

For your convenience, charge/debit card or electronic check payments may be made through <https://utilitiesinc.firstbilling.com> or by calling First Billing Services at 888-562-3451. There is a convenience fee for this service. You may also visit our website at [www.uiwater.com](http://www.uiwater.com) for more information. Returned payments will be subject to the maximum fees allowed by your state.

We thank you for your prompt attention to this matter.

Collections Department  
Water Service Corp of Kentucky

REG DISCON

Water Service Corp of Kentucky

PO Box 160609 Altamonte Springs FL 32716 P:(844) 310-5556 www.uiwater.com



Account Number: [REDACTED]  
Please Pay: **\$50,044.45**

Amount Paid

AMBLESIDE

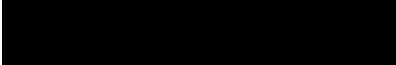
[REDACTED]

Water Service Corp of Kentucky  
PO BOX 11025  
LEWISTON ME 04243-9476



December 30, 2018

AMBLESIDE



Account Number: [REDACTED]

Dear AMBLESIDE:

Our records indicate that there is an outstanding balance of \$52085.65 on your water and/or wastewater account. If you have already mailed your payment, we apologize for any inconvenience and thank you for your payment.

If your payment has not been mailed, please send in the full outstanding balance today. If we do not hear from you within 10 days of the date on this letter, your service may be severed without additional notification. For your service to be reinstated, the outstanding balance and all applicable fees must be paid in full.

For your convenience, charge/debit card or electronic check payments may be made through <https://utilitiesinc.firstbilling.com> or by calling First Billing Services at 888-562-3451. There is a convenience fee for this service. You may also visit our website at [www.uiwater.com](http://www.uiwater.com) for more information. Returned payments will be subject to the maximum fees allowed by your state.

We thank you for your prompt attention to this matter.

Collections Department  
Water Service Corp of Kentucky

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