

**YUNKER & ASSOCIATES**

Doris J. Elliott, Paralegal  
P.O. Box 21784  
Lexington, KY 40522-1784

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FEB 11 2009

PUBLIC SERVICE  
COMMISSION

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February 9, 2009

Stephanie L. Stumbo  
Executive Director  
PUBLIC SERVICE COMMISSION  
P.O. Box 615  
Frankfort, KY 40602-0615

Re: Case No. 2008-00176; Alleged Failure of the City of Danville to Comply with KRS 278.160 and 278.180 and the Commission's Order of August 10, 1994 in Administrative Case No. 351

Dear Ms. Stumbo:

Enclosed please find the original and ten (10) copies of the following filings for filing in the above-referenced proceeding on behalf of the City of Danville:

- Response to Parksville Water District's Second Data Request; and
- Motion to Dismiss

Thank you for your attention to these filings. Please contact me if you have any questions.

Sincerely,



Doris J. Elliott

Enclosures

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

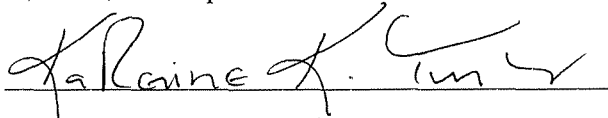
In the Matter of:

Alleged Failure of the City of Danville to Comply with  
KRS 278.160 and 278.180 and the Commission's Order  
of August 10, 1994 in Administrative Case No. 351

Case No. 2008-00176

**Response of the City of Danville  
to Parksville Water District's Second Data Request**

The City of Danville hereby responds to the second data request served by Parksville  
Water District on January 22, 2009; the response is attached hereto.

By:   
ATTORNEYS FOR THE CITY OF DANVILLE

H. Vincent Pennington, III  
SHEEHAN, BARNETT, DEAN & PENNINGTON, P.S.C  
114 S. Fourth St.  
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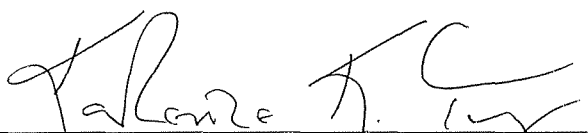
CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this the 9th day of February, 2009, the original and ten (10) copies  
of this response were mailed for filing with the Commission, and a copy was sent by first-class  
U.S. mail for service on:

William L. Stevens, Esq.  
Taylor & Stevens  
326 W. Main St.  
P. O. Box 901  
Danville, KY 40423

Harold C. Ward  
Garrard County Water Association, Inc.  
315 Lexington Rd.  
P. O. Box 670  
Lancaster, KY 40444

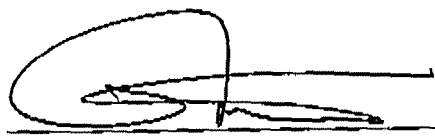
John N. Hughes, Esq.  
124 W. Todd St.  
Frankfort, KY 40601

  
Attorney for the City of Danville

STATE OF KENTUCKY     )  
                                  )    SS:  
COUNTY OF BOYLE     )

CERTIFICATION

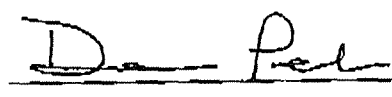
The following response on behalf of the City of Danville was prepared by me or under my supervision and it is true and correct to the best of my knowledge, information and belief formed after reasonable inquiry.



A handwritten signature in black ink, appearing to read 'Paul Stansbury', written over a horizontal line.

PAUL STANSBURY, City Manager

SUBSCRIBED and SWORN to before me, a Notary Public, this the 6 day of February, 2009.



A handwritten signature in black ink, appearing to read 'Dan Paul', written over a horizontal line.

My commission expires: March 7, 2009

**Request:**

1. Refer to Item 13 of the January 12, 2009 Response. The Response says that a second meter was installed to serve Parksville in December, 2006.
  - a. Provide the meter serial number for the meter serving Parksville prior to December, 2006 and the last meter reading for that meter prior to the installation of the “second” meter in December, 2006 and the first meter reading of that meter subsequent to the installation of the “second” meter in December, 2006.
  - b. Provide the location and meter serial number for the “second” meter installed in December, 2006 and the meter reading for that meter for the first month’s billing to Parksville subsequent to its installation.
  - c. Explain how the meter readings of the two meters are reflected on Parksville’s monthly bill and any difference in the manner in which the readings are reflected on the bills subsequent to the installation of the “second” meter.

**Response and Correction:**

Danville’s 1/12/09 Response Item 13 should have stated that a second measuring device for service to Parksville was installed in June 2006. Using that corrected month, Danville responds to Parksville’s requests as follows:

The two measuring devices (or “meters”) are installed in the same piece of equipment, which had and has a serial number of 89483984. Danville’s records indicate that it was Parksville that added a device or changed out the existing device for two others. One device measures higher-flow volumes; the other, lower-flow volumes.

The last prior reading was for May 2006 volumes and occurred on June 1, 2006; the reading at that time was 46,735,900.

The next reading, for June 2006 volumes, was taken on July 1, 2006; the readings at that time were 85,830 (high) and 32,120 (low).

Over the applicable period, the meter readings are presented in a row on the statements to Parksville, with the following column headings:

<u>Date</u>	<u>Meter nbr</u>	<u>Current reading</u>	<u>Prior reading</u>	<u>Meter units</u>	<u>Mult</u>
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Prior to the statement sent in January 2007, there was one row and the meter number is "2". Between the change in June 2006 and January 2007, the bill for Parksville was being calculated manually and, as before, had only one row.

In the statements sent in January 2007 and thereafter, there are two rows. The meter numbers are "1" for the lower-flow device and "3" for the higher-flow device. Examples of the statements -- dated 8/15/05, 9/15/06, and 4/01/08 -- are attached hereto.



CITY OF DANVILLE  
ACCOUNTS RECEIVABLE  
STATEMENT

RETURN THIS  
STUB WITH PAYMENT

PARKSVILLE WATER\*  
PO BOX 9\*  
PARKSVILLE KY 40464  
USA

Stmt date  
=====

Customer #  
=====

08/15/05

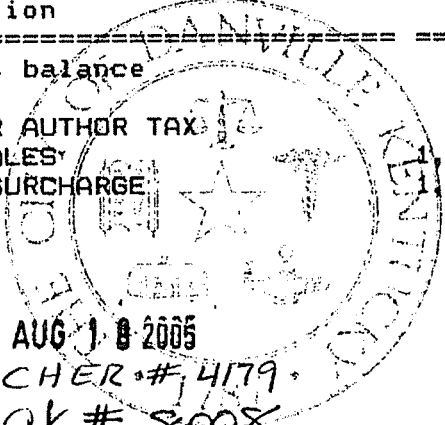
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PARKSVILLE KY

DUE DATE 09/10/05  
FROM 07/01/05 TO 08/01/05

Date	Meter nbr	Current reading	Prior reading	Meter units	Mult
08/01/05	2	36,404,00	35,182,80	1,221,200	1

Date	Code	Description	Units	Unit price	Amount
07/25/05		Previous balance			
08/01/05	15	KY RIVER AUTHOR TAX			260.12
00/00/00	100	WATER SALES	1,221,200		11,908.92
00/00/00	120	REGION SURCHARGE	1,221,200		2,381.78



ENTERED AUG 18 2005

A/P VOUCHER # 4179

Paid - ck # 8008

Current	30 Days	60 Days	90 & over	Interest	Balance due
14,550.82	.00	.00	.00	.00	14,550.82

ADD 10% OF CURRENT BILL IF NOT PAID BY DUE DATE

AFTER DUE DATE

(+ 10%) = \$ \_\_\_\_\_



CITY OF DANVILLE  
ACCOUNTS RECEIVABLE  
STATEMENT

200040  
RETURN THIS  
STUB WITH PAYMEN

PARKSVILLE WATER\*  
PO BOX 9\*  
PARKSVILLE KY 40464  
USA

Stmt date  
=====

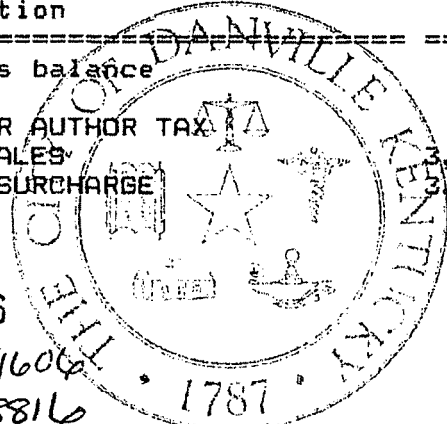
Customer #  
=====

PARKSVILLE KY

DUE DATE 10/10/06  
AUTO DEBITING NOW AVAILABLE

Date	Meter nbr	Current reading	Prior reading	DUE DATE	Meter units	Mult
09/01/06	2	3,532,840	415,100		3,117,740	1

Date	Code	Description	Units	Unit price	Amount
08/29/06		Previous balance			
09/01/06	15	KY RIVER AUTHOR TAX			514.43
00/00/00	100	WATER SALES	3,117,740		31,138.60
00/00/00	120	REGION SURCHARGE	3,117,740		6,227.67



ENTERED SEP 20 2006  
A/p VOUCHER # 4600  
Paid - ck # 8816

Current	30 Days	60 Days	90 & over	Interest	Balance due
37,880.70	.00	.00	.00	.00	37,880.70

ADD 10% OF CURRENT BILL IF NOT PAID BY DUE DATE

AFTER DUE DATE (+ 10%) = \$ \_\_\_\_\_

