

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TAMMY ROGERS)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2008-00513
)	
NORTHEAST WOODFORD COUNTY)	
WATER DISTRICT)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST SET OF INFORMATION REQUESTS
TO NORTHEAST WOODFORD COUNTY WATER DISTRICT

Northeast Woodford County Water District ("Northeast Woodford"), pursuant to 807 KAR 5:001, shall file with the Commission the original and six copies of the information requested herein on or before April 22, 2009. 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 the 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.

Northeast Woodford shall make timely amendment to any prior response if it obtains 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 Northeast Woodford fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Provide the minutes of Northeast Woodford's board meeting on December 2, 2008 and each meeting since that date.
2. State the water usage for Phillip and Tammy Rogers for each month since September 2007.
3. Provide a copy of the handwritten log, computer printout, or other documentation that shows the records of the meter reader, reflecting the reading of the Rogers' meter.
4. Identify each month, if any, since September 2007 that the Rogers' water bill was based on an estimated usage.
5. State the amount of water sold by Northeast Woodford to all of its customers for each month since September 2007.
6. Identify all employees who regularly read meters each month.

7. Identify the specific employee(s) who read the Rogers' meter for each month since September 2008.


8. State each date on which the Rogers' meter was read since September 2008.

9. Identify the type of meter that serves the Rogers. In your response, include the size, manufacturer, model, and whether it is a manual read meter, touch read meter, or radio read meter.

10. Identify when the Rogers' meter was first put into service and state the date on which it was last tested for accuracy.

11. Refer to paragraph 7 of the Answer. Identify the laws or regulations that require the utility to report the presence of coliform bacteria in the water system to its customers.

12. State whether Northeast Woodford took any measures to reduce or eliminate coliform bacteria in its system after samples indicated its presence and, if so, describe the measures that were taken.



Jeff R. Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED: APR 08 2009

cc: Parties of Record

Steele Davis
Chairman
Northeast Woodford County Water District
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Versailles, KY 40383

Tammy Rogers
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