

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE VILLAS OF WOODSON BEND)	
CONDOMINIUM ASSOCIATION, INC.)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2009-00037
)	
SOUTH FORK DEVELOPMENT, INC.,)	
TIMOTHY L. GROSS, and THE JANICE)	
GROSS LIVING REVOCABLE TRUST)	
)	
DEFENDANTS)	

COMMISSION STAFF'S FIRST SET OF INFORMATION REQUESTS
TO THE VILLAS OF WOODSON BEND CONDOMINIUM ASSOCIATION, INC.

The Villas of Woodson Bend Condominium Association, Inc. ("Villas"), pursuant to 807 KAR 5:001, shall file with the Commission the original and six copies of the information requested herein within 14 days of the date of issuance of this information request. 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.

The Villas 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 the Villas 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. Define the term "rent" as used throughout the complaint.
2. Provide copies of any correspondence related to sewage treatment services and rates/rents between the parties.
3. State the rate/rent for sewage services and identify how frequently the Defendants demand that amount to be paid.
4. Provide copies of all invoices or bills received from the Defendants for sewer services.
5. Identify what invoices or bills for sewer services have been paid.

6. Identify each electric bill related to sewer service that the Villas paid on behalf of Defendants. Include the total amount billed and the amount paid by the Villas.



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

DATED: MAY - 4 2009

cc: Parties of Record

Michael Hirn
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202

South Fork Development, Inc.
100 The Villas
Bronston, KY 42518

The Villas of Woodson Bend Bend Condo. Assoc.
2609 Idlewood Drive
Lexington, KY 40513

Timothy L. Gross
100 The Villas
Bronston, KY 42518