

**PARKSIDE MANOR MHP RADCLIFF LLC
1855 S. WILSON ROAD
RADCLIFF, KY. 40160
T: (270) 351-6300
F: (270) 351-6311**

RECEIVED
APR 14 2009
PUBLIC SERVICE
COMMISSION

Thursday, April 02, 2009

**KENTUCKY PUBLIC SERVICE COMMISSION
211 SOWER BLVD.
PO BOX 615
FRANKFORT, KENTUCKY 40602
ATTN: MR. JEFF DEROUEN**


PARKSIDE MANOR MHP RADCLIFF LLC

NOTICE OF RIGHT TO INTERVENE

To Whom It May Concern,

I am writing this letter on behalf of the Owner of Parkside Manor MHP Radcliff LLC in regard to Hardin County Water District # 1 and the Master Meter Proposal for Mobile Home Park Communities (case no. 200900113.) The Owner and I are asking that the PSC grant a right for a full intervention as stated in 807 KAR 5:01 section 3 (8). The Owner and Property Manager of Parkside Manor MHP Radcliff LLC located at 1855 S. Wilson Road Radcliff Ky. 40160, have a very special interest in this case and ask that PSC intervene.

Sincerely,


**Roger L. Washburn
Property Manager**

**Encl # 1 Exerts from the HCWD #1 Proposal
Encl # 2 Concerns pertaining to HCWD # 1 Proposal
Encl # 3 Picture taken of a home by HCWD # 1**

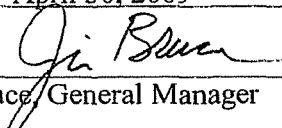
(Creating new policies which have not previously been approved. Related tariff section; Sheet No. 7, Meter Connection Fees)Hardin County Water District No. 1CLASSIFICATION OF SERVICE:
MASTER METER BILLING

(N)

1. **Applicability:** These rules and policies apply to any existing property which as of the approval date of this tariff have an installed master meter available, and which downstream or sub-meters of the master meter are currently located on private property and which sub-meters were installed by the property owner, and which water lines or mains between the master meter and sub-meters are located on private property and have been installed without approval or review by the Division of Water, nor were installed by the District, nor have been or would be maintained, repaired, replaced or owned by the District.
2. **Purpose of Policy:**
 - a. To charge the property owner for all water, including that water which is being lost or leaking within their private water service lines or water mains, and for all water used for domestic or potable use within their property boundary.
 - b. To make these meter locations consistent with the District's tariff, Sheet No. 7, item A.3, which tariff was approved by the Public Service Commission on October 1, 2000 and to bring all properties with an installed master meter in compliance with Public Service Commission regulation; KAR 807, 5:066, Section 12, 1.B, and to treat all multi-unit, residential properties, within the District's service area, consistent and the same.
 - c. To ensure that lost water due to a property owner or customers private plumbing leaks does not increase the District's unaccounted for water excessively, or cause a subsidy or added cost to the District's other customers.
 - d. To remove, avoid or decrease obstacles and risks to the District, its employees and the general public which current risks occur daily as a result of meters located on private property which include but are not limited to;
 - i. Raw sewage in potable water meter pits as a result of private leaking sewer lines or above ground sewer connections which can create a significant cross connection or contamination to other water customers connected to the public water system, or that private water system located on private property.
 - ii. Dog bites or attacks due to meters being located inside private fencing or too close to tied up dogs
 - iii. Theft of service and financial loss to the District as a result of persons moving onto private property where the property owner, or their maintenance representative, turns on service to a lot, trailer or building without informing the District; theft of service as a result of a person tampering with or installing a different meter from a different trailer or building without the knowledge of the District.
 - iv. An employee injury or risk of having to crawl under a mobile home or deck or other structure to read or maintain the meter on private property where the District had no choice

DATE OF ISSUE: April 30, 2009DATE EFFECTIVE: May 31, 2009

ISSUED BY


Jim Bruce, General Manager Radcliff, Kentucky

(Creating new policies which have not previously been approved. Related tariff section; Sheet No. 7, Meter Connection Fees)

Hardin County Water District No. 1

CLASSIFICATION OF SERVICE: MASTER METER BILLING

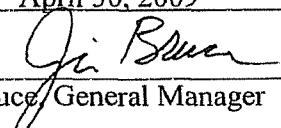
on the location of the meter, nor was informed that a structure or mobile home would be parked or built over the meter.

- e. To provide property owners an option to avoid using a master meter for billing water and sewer use at their property by installing new water and sewer mains, meters and other appurtenances which would be placed within a public utility easement, and be transferred to the District for all future maintenance and replacement, which installation would provide for individual meters to be installed within the easement, and used for direct billing individual dwelling structures.
3. **Basic Account Policies; The following rules and policies apply to only those customers which this section is applicable:**
- a. All properties served by a master meter, which also has downstream or sub-meters installed on private property and which are currently used for billing purposes, will be changed back to master meter billing effective sixty (60) days after the approval date of this tariff section.
- b. All customers of the District who have been paying a water bill based on a water meter which has been located on private property, will have their account closed and a final bill calculated, and any deposit held by the District at the time of the final bill will be applied to any balance, and any remaining deposit amount will be returned to that customer. All affected customers will receive written notice of this change within ten (10) days of the effective date of this tariff, and said notice will include the final date which any usage up to including the final day will be included in their final bill.
- c. Once the effective date is reached, all billing for water passing through the master meter will be sent to the property owner, or their designee.
4. **Transition to Master Meter Billing:**
- a. In order to continue to receive service after the effective date, each property owner which property is applicable to this policy and section, will need to provide the District with information as required for all new customers to open an account. A deposit may also be required, in accordance to the District's latest deposit policy and this tariff.
- b. Any water leaks on private property, which will be billed through the master meter, will be the responsibility of the property owner to repair. Water being leaked after the effective date will be included in all billings after that date.
- c. After the effective date is reached and accounts have been established for each master meter in the property owners name, the District will transfer ownership of any water meters currently used for District billing of customers located on private property. These meters may be used for sub-meter billing for those renters, subject to restrictions of this policy. The transfer of ownership shall be made in writing and sent certified mail. The notification will provide a list of each meter including meter diameter, brand of meter, serial number and last test date. Transfer of these meters shall be at no cost to the property owner. Once transfer notification is made, the District shall no longer own these

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Hardin County Water District No. 1

CLASSIFICATION OF SERVICE: MASTER METER BILLING

specific meters, maintain test or repair these meters, nor shall any of these meters be used in the future by the District for billing purposes.

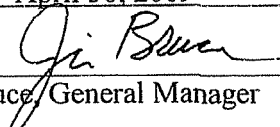
5. **Alternative to Master Metering:**

- a. Any property owner to which this section is applicable will be provided an option to avoid being billed by a master meter, and be able to allow the District to individually bill his/her tenants or occupants within his/her property. Said option or exception shall be executed or approved only as follows;
 - i. The property owner will be required to replace and or install new water and or sewer mains within their private property to current construction standards of the District, and the Division of Water. Said standards will require design by a professional engineer, registered in Kentucky, and plans will require review and approval by both the District and the Division of Water.
 - ii. All costs, including design, inspection, materials and construction will be borne by the property owner.
 - iii. Once installed and accepted by the District, and a one year warranty has passed during which time the property owner will be responsible for all repairs, the owner will then transfer ownership of the facilities to the District. After transfer occurs, the District will then be responsible for all maintenance and replacement of subject facilities.
 - iv. If the facilities being installed lie within a non-public right of way, or within a private road or private property, then the owner will also be required to dedicate a public utility and access easement, which shall be recorded with the County Clerk and Recorder. Said easement shall allow the District to access, work within and maintain all facilities within the easement.
 - v. Once the new facilities are installed, including the installation of water meters within the public easement, then the District will agree to open individual water and sewer accounts direct with each individual dwelling unit, renter, tenant or resident living within the property of the owner. The District will then bill that individual account for all water and sewer charges recorded by that individual meter / customer.
 - vi. Once 100% of all properties within the development are individually metered, the District will agree to de-activate the master meter, and no further billing will occur to the owner through the master meter. This includes any water lost within the property due to leaks and theft of services.

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Friday, April 03, 2009

CONCERNS ABOUT MASTER METERING MHPs

PURPOSE OF POLICY ITEM D:

- **HOW WILL MASTER METERING A PROPERTY PREVENT RAW SEWAGE FROM RUNNING INTO METER PITS? THAT IS A PROBLEM THAT SHOULD BE ADDRESSED TO THE PROPERTY OWNER BY THE HEALTH DEPT.**
- **MAKE PROPERTY OWNER RESPONSIBLE TO INSURE THAT NO METERS ARE ENCLOSED BY A FENCE, ALSO TO NOT ALLOW ANIMALS TO BE TIED NEAR THE UTILITIES.**
- **DO NOT ALLOW PROPERTY OWNERS OR MAINTENANCE STAFF TURN ON WATER AT HOMES WITH NEW OCCUPANTS. REMOVE ALL WATER METERS FROM VACANT LOTS AND OR HOMES.**
- **IF A DECK, PORCH, OR HOME IS PARKED OVER A WATER METER, MAKE PARK OWNER RESPONSIBLE TO RELOCATE THE METER OR RELOCATE THE HOME.**

TRANSITION TO MASTER METER BILLING ITEM C:

- **SOME MHPs WHEN THE WATER DISTRICT CHANGED FROM MASTER METERS TO SUB-METERING HAD TO PURCHASE THE METERS FROM THE DISTRICT, HOW CAN THE DISTRICT TRANSFER OWNERSHIP OF SOMETHING IT DOESN'T OWEN?**

5 ALTERNATIVES TO MASTER METERING

- **THE HARDIN COUNTY WATER DISTRICT SAYS THAT AFTER ALL PARKS COME INTO COMPLIANCE BY UP GRADEING THEIR WATER LINES, SEWER LINES, AND MOVE THE METERS TO THE EDGE OF THE STREETS, THEN THE WATER COMPANY WOULD STOP THE MASTER METERING AND PICK UP READING THE METERS AGAIN.**
- **TO UP GRADE A MHP WITH #312 SPACES WOULD COST AN ESTIMATED \$ 300,000.00 TO \$ 400,000.00, A COST THAT MANY OF THE MHPs COULD NOT AFFORD.**
- **THE COST TO THE MOBILE HOME PARKS THAT THE MASTER METERING IS GOING TO CAUSE IS GOING TO BE HIGH, IN MAN HOURS AND REQUIRE MOST PARKS TO HIRE MORE PERSONNEL TO READ METERS AND DO CALCULATIONS. ALSO THE MHPs WILL HAVE TO INCUR THE COST OF TESTING THE WATER SUPPLY EVERY MONTH AS WELL AS**

THE CALIBRATION COSTS OF THE METERS WHICH IS A US. DEPT OF AGRICULTURE REQUIREMENT.

CLOSING:

THER ARE MANY AREAS WITHIN THE PROPOSAL THAT IS GOING TO CAUSE A GREAT STRAIN ON THE MOBILE HOME PARK OPERATORS/OWNERS AS WELL AS TO THE RESIDENTS AND TENANTS OF THESE MOBILE HOME PARKS. THERE ARE AREAS IN THE PROPOSAL THAT IF THE PARK OWNERS WERE MADE TO ADDRESS THOSE PROBLEMS, MASTER METERING WOULD NOT HAVE TO BE DONE. NOT ALL THE MOBILE HOME PARKS HAVE THE PROBLEMS THAT THE WATER DISTRICT IS SAYING. WHY CAUSE THE MOBILE HOME PARKS WHO ARE NOT HAVING THESE PROBLEMS GO TO MASTER METERING BECAUSE OF A FEW SELECT PARKS. THOSE PARKS SHOULD BE HELD ACCOUNTABLE FOR THEIR SHORT COMINGS AND THE PARKS THAT ARE NOT HAVING THE PROBLEMS BE OMITTED FROM THE PROPOSED TARIFF. IT SEEMS THAT THE WATER COMPANY HAS DECIDED THAT THEY JUST DO NOT WANT TO READ THE METERS ANYMORE. THERE HAVE BEEN CASES WHEN THE WATER COMPANY HAS ESTIMATED A RESIDENTS BILL, AND WHEN QUESTIONED WHY, THE ANSWER WAS THEY COULDN'T READ THE METER, BUT WHEN IT WAS CHECKED, IT WAS FOUND THERE WAS NO REASON THAT THE METER COULDN'T HAVE BEEN READ. AS THE PROPERTY MANAGER OF ONE OF THE LARGEST PARKS IN THE AREA, THE COST OF UP GRADE TO THE OWNER WOULD BE ASTRONOMICAL AND THAT COST WOULD BE FILTERED DOWN TO THE RESIDENTS BY HIGHER LOT RENTS.

Sewage Leaks

The winter Storking in This lot is now water, not Sewage. Also This is not a new
Picture The shed has not been at this home for over 4 years.

