

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

IN THE MATTER OF:

AUG 18 2009

APPLICATION OF HARDIN COUNTY WATER )  
DISTRICT #1 TO MODIFY )  
WATER UTILITY TARIFF )  
OF MASTER METERS FOR BILLING )  
MULTI-UNIT RESIDENTIAL PROPERTIES )

PUBLIC SERVICE  
COMMISSION

CASE NO. 2009-00113

**DATA REQUEST BY MOBILE HOME COMMUNITIES**

Homestead Manufactured Home Community, Yarwood Mobile Home Park, LLC, Country Lane Mobile Home Park, Duvall Mobile Home Park, Masden's Mobile Home Park, LLC, Lynch's Mobile Home Park, Golden Rainbow Mobile Home Park, Inc., Parkside Manor MHP Radcliff, LLC, Rogersville Mobile Home Park and Paradise Mobile Home Park, Inc. (collectively "Mobile Home Communities"), by counsel, hereby propounds the following supplemental data requests to Hardin County Water District #1 ("Hardin County") in accordance with the Public Service Commission's ("PSC") Order of July 27, 2009.

**Data Request No. 1.** Hardin County's Answer to the PSC's First Data Request No. 1 contained a spreadsheet reflecting that the individual lots in the Brentwood Estates Mobile Home Park ("MHP") and the Country Lane MHP used more water than was actually measured by the master meter in the month of 2008. Please explain how this could have occurred.

**Data Request No. 2.** Hardin County's Answer to the PSC's First Data Request No. 1 reflected that 97% of the water provided to Park Valley Community MHP through its master meter was not billed to an individual lot. Please describe the steps taken by Hardin County to notify Park Valley Community MHP of this condition and state what steps, if any, were taken by Hardin County to correct this condition.

**Data Request No. 3.** Please state the steps taken by Hardin County to calibrate or ensure

the accuracy (“calibrate”) the master meters used by the Mobile Home Communities and to calibrate the meters used for each individual Mobile Home Community lot, and the frequency of calibration.

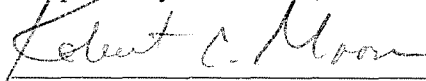
**Data Request No. 4.** Please state whether an MHP is notified on a monthly basis of the difference between the amount of water measured by the master meter for the MHP and the total amount of water provided to the individual units in the MHP, and the steps taken by Hardin County to correct this difference.

**Data Request No. 5.** Hardin County’s Answer to the PSC’s First Data Request No. 2 provided copies of laboratory reports containing the results of the sampling of water present in the meter pits of eight current MHP lots. Please identify the mobile home communities from which these samples are collected and state whether this information was provided to the owners of the mobile home communities.

**Data Request No. 6.** Please state the method used by Hardin County to determine the water loss for its individual customers.

**Data Request No. 7.** Please state whether Hardin County’s customers, excluding customers living in MHPs, have meters that are inaccessible because they are under steps or behind a fence and state the number of such inaccessible meters.

Respectfully Submitted,



---

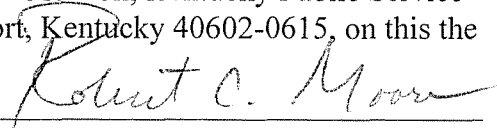
Robert C. Moore  
Hazelrigg & Cox, LLP  
415 West Main Street, 1<sup>st</sup> Floor  
P.O. Box 676  
Frankfort, Kentucky 40602-0676

Counsel for Homestead  
Manufactured Home Community,  
Yarwood Mobile Home Park, LLC,  
Country Lane Mobile Home Park,

Duvall Mobile Home Park,  
Masden's Mobile Home Park, LLC,  
Lynch's Mobile Home Park, Golden  
Rainbow Mobile Home Park, Inc.,  
Rogersville Mobile Home Park,  
Parkside Manor MHP Radcliff, LLC,  
and Paradise Mobile Home Park, Inc.

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by first class mail, postage prepaid, on David T. Wilson II, Skeeters, Bennett, Wilson & Pike, 550 W. Lincoln Trail, Blvd., P. O. Box 610, Radcliff, Kentucky 40160, Todd Osterloh, Kentucky Public Service Commission, 211 Sower Boulevard, P. O. Box 615, Frankfort, Kentucky 40602-0615, on this the 18<sup>th</sup> day of August, 2009.



Robert C. Moore