

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF FARMDALE DEVELOPMENT) CASE NO.
CORPORATION FOR TARIFF REVISIONS AND TO) 2009-00185
INCREASE CERTAIN NONRECURRING CHARGES)

SECOND DATA REQUEST OF COMMISSION STAFF
TO FARMDALE DEVELOPMENT CORPORATION

Pursuant to 807 KAR 5:001, Farmdale Development Corporation ("Farmdale Development") is to file with the Commission the original and four copies of the following information, with a copy to all parties of record. The information requested herein is due on or before August 17, 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 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.

Farmdale Development 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 Farmdale Development fails or refuses to furnish all or part of the requested

information, Farmdale Development shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

All tax identification numbers; social security numbers; date of birth and e-mail addresses of individuals should be redacted from material to be filed herein. Otherwise, careful attention should 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. In response to Question 1(a) of Staff's first Data Request, Farmdale Development stated that there is no written agreement with Farmdale Water District ("Farmdale Water").

a. If there is no written agreement, is there an oral agreement? If so, provide a summary of the agreement.

b. If no oral agreement, how is Farmdale Water authorized to bill for Farmdale Development?

c. How was the fee determined?

2. In response to Question 1(b) of Staff's first Data Request, Farmdale Development stated that Farmdale Development governs how their customers are billed. What is meant by this statement?

a. Does Farmdale Development provide bills to Farmdale Water for inclusion with the bills mailed by Farmdale Water?

(1) How is this done since Farmdale Water bills by a post-card type billing statement?

(2) If Farmdale Development has a separate bill that is used provide copies of the type of bill.

(3) If Farmdale Development does not provide a separate bill, explain and provide a copy of a bill sent to its customers for the sewer service.

b. (1) State whether a joint customer of Farmdale Development and Farmdale Water is required to pay his bill for sewer service and water service with separate checks made out to each utility.

(2) State the reason that Farmdale Development seeks to have a separate returned check fee.

(a) If the customers of Farmdale Development pay by one check to Farmdale Water, why would Farmdale Development need to have a separate returned check charge?

(b) What charge is being paid directly to Farmdale Development that would create a scenario for a returned check from its customers?

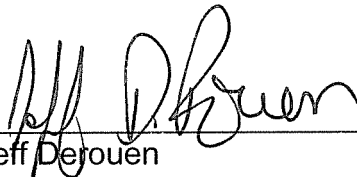
3. In response to Question 4(a) & (b) of Staff's first Data Request, Farmdale Development stated that there had been discussions concerning Farmdale Water's disconnection of Farmdale Development's customers for non-payment. Were these discussions written or oral discussions?

a. If these were oral discussions, were there any notes taken? If so, provide copies of the notes.

b. If these were written discussions, provide copies of any correspondence.

c. Has Farmdale Water provided any reason why it did not want to request a deviation to terminate service for non-payment of the sewer bill?

d. In Farmdale Development's response to questions in Case No. 2007-00436,¹ it stated that Farmdale Water does not accept partial payments from Farmdale Development customers for their water and sewer services and that, if the bill is not paid in a timely manner, Farmdale Water disconnects water service. Explain why Farmdale Development is requesting a mechanism to disconnect the service for non-payment.



Jeff Dejouen
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, Kentucky 40602

DATED AUG - 6 2009

cc: Parties of Record

¹ Case No. 2007-00436, Application of Farmdale Development Corporation for an Adjustment in Rates Pursuant to the Alternative Rate Filing Procedure for Small Utilities (Ky. PSC Dec. 20, 2007).

Carroll F Cogan
President
Farmdale Development Corporation
1706 Bardstown Road
Louisville, KY 40205

Honorable Robert C Moore
Attorney At Law
Hazelrigg & Cox, LLP
415 West Main Street
P.O. Box 676
Frankfort, KY 40602