

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF EAST DAVIESS WATER)
ASSOCIATION, INC. TO INCREASE CERTAIN) CASE NO. 2009-00341
NONRECURRING CHARGES)

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO EAST DAVIESS WATER ASSOCIATION, INC.

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that East Daviess Water Association, Inc. ("East Daviess Water Association") file the original and eight copies of the following information with the Commission within 14 days of the date of this request, with a copy to all parties of record.

Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating 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.

East Daviess Water Association 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 East Daviess Water Association fails or refuses to furnish all or part of the requested information, East Daviess Water Association shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

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.

1. Refer to "Average Meter Connection Expense Cost Justification."
 - a. Provide invoices to support the costs for materials and labor. If no supporting invoices are available, describe how East Daviess Water Association determined the cost of each material.
 - b. State how the hourly rate of \$45.00 for installation labor expense was derived.
 - c. Provide a copy of the invoice or contract that supports "Installation Equipment Expense" of \$200.
 - d. State how the hourly rate of \$18.96 was derived.
 - e. State the items that are included in "Installation Miscellaneous Expense."

2. "Average Meter Connection Expense Cost Justification" contains an "office expense" component of \$20.78 for "establishing a new account and billing record." "Connection/Turn On Charge" contains a similar component under the category "Clerical and Office Expense," but this component is only \$10.00. Explain why the component for average meter connections is larger. Your response should include the activities included in the average meter connection cost justification that are not performed when merely turning on an account.

3. State how the labor time was determined for:

- a. Connection/Turn On Charge;
- b. Connection/Turn On Charge (After Hours);
- c. Reconnection Charge;
- d. Reconnection Charge (After Hours); and,
- e. Service Call/Investigation (After Hours).

4. Explain why the labor component of "Clerical and Office Expense" for Connection/Turn On Charge (After Hours), Reconnection Charge (After Hours), and Service Call/Investigation (After Hours) is \$3.00 larger than that for Connection/Turn On Charge and Reconnection Charge.

5. Explain why the supplies component of "Clerical and Office Expense" for Connection/Turn On Charge (After Hours), Reconnection Charge (After Hours), and Service Call/Investigation (After Hours) is \$2.50 larger than that for Connection/Turn On Charge and Reconnection Charge.

6. Explain why the transportation component of "Miscellaneous Expense" for Connection/Turn On Charge (After Hours) and Reconnection Charge (After

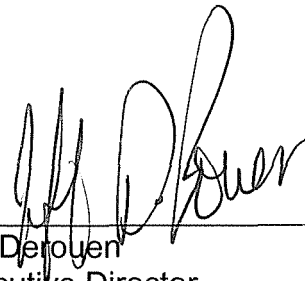
Hours) is \$3.00 larger than that for Connection/Turn On Charge and Reconnection Charge.

7. Explain why East Daviess Water Association is not revising the charge for "Service Call/Investigation."

8. Explain why East Daviess Water Association has not established a specific fee for the connection of meters that are 1-inch or larger, but instead wishes to apply "actual cost" principles.

9. State the number of meters that East Daviess Water Association has installed since December 31, 2004, in the following sizes:

- a. 1-inch;
- b. 1.5-inch;
- c. 2-inch; and
- d. 3-inch or larger.



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

DATED: NOV - 2 2009

cc: Parties of Record

Case No. 2009-00341

Frankie Fulkerson
Manager
East Daviess County Water Association, Inc.
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