

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2009-00428

RECEIVED

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE
WATER SERVICE RATES OF THE CITY OF
GREENSBURG, KENTUCKY

JUN 30 2010

PUBLIC SERVICE
COMMISSION

GTWD'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR ADMISSIONS TO THE
CITY OF GREENSBURG

INTERROGATORY NO. 1: State the name, address of the person or persons responding to these interrogatories.

INTERROGATORY NO. 2: At the time of the City of Greensburg's ("COG") enactment of ordinance 2009-0706, did COG have in its possession financial data to justify its proposed wholesale water rate of \$2.206 per 1000 gallons?

INTERROGATORY NO. 3: If your answer to Interrogatory No. 2 is affirmative, please explain the following:

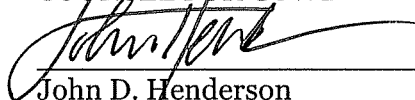
- (a) why GTWD did not receive the data until on or about March 5, 2010, when that data was first requested no later than August 5, 2009?
- (b) on August 5, 2009, could COG have provided the financial data to GTWD?
- (c) why did COG respond to GTWD's request for the financial data with an analysis prepared by its engineers and accountant?

INTERROGATORY NO. 4: If your answer to Interrogatory No. 2 is negative, please explain how the proposed wholesale water rate was calculated.

REQUEST FOR ADMISSION NO. 1: Admit that COG's last proposed wholesale water rate increase for GTWD (approximately 2005) did not require an analysis prepared by its engineers and accountant.

REQUEST FOR ADMISSION NO. 2.: Admit that COG did not request any reimbursement of any costs with regard to its last proposed wholesale water rate increase for GTWD (approximately 2005).

COUNSEL FOR GTWD



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Greensburg, Kentucky 42743
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was mailed, postage prepaid, this 29th day of June, 2010, to the following:

Hon. George C. Cheatham II
CITY OF GREENSBURG
110 West Court Street
Greensburg, Kentucky 42743

ORIGINAL AND SIX COPIES TO:

PUBLIC SERVICE COMMISSION
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615



John D. Henderson