

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BOONE COUNTY WATER)
DISTRICT FOR APPROVAL OF AN INCREASE) CASE NO. 2010-00019
IN CERTAIN NONRECURRING CHARGES)

COMMISSION STAFF'S FIRST INFORMATION REQUEST TO
HOME BUILDERS ASSOCIATION OF NORTHERN KENTUCKY

Home Builders Association of Northern Kentucky ("HBA"), pursuant to 807 KAR 5:001, shall file with the Commission, within 15 days of the date of this request, the original and ten copies of the following information. 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 the 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.

HBA 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 HBA fails or

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

Careful attention shall 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. List all Kentucky counties where HBA members do work relevant to the issues in this case.

2. In addition to Boone County Water District ("Boone District"), what other jurisdictional water companies (investor-owned, water districts, or water associations) provide water service to any HBA members?

3. List separately, for each calendar year from 2007 through 2009 and from January 1, 2010 through June 30, 2010, the number of members belonging to HBA.

4. What are HBA's requirements for membership?

5. What is the organizational purpose of HBA?

6. What services or products does HBA provide its members?

7. Describe the impact the proposed increases in Boone District's tapping fees would have on HBA's members for both 5/8-inch x 3/4-inch meter connections and 1-inch meter connections.

8. List separately, for each calendar year from 2007 through 2009 and from January 1, 2010 through June 30, 2010:

a. The number of new 5/8-inch x 3/4-inch meter connections that Boone District installed for HBA's members and how many of these were for short-side installation and how many were for long-side installation (installed under a roadway).

b. The number of new 1-inch meter connections that Boone District installed for HBA's members and how many of these were for short-side installation and how many were for long-side installation.

9. Do HBA members pay Boone District directly for the installation of 5/8-inch x 3/4-inch meter connections? If not, explain.

10. Do HBA members pay Boone District directly for the installation of 1-inch meter connections? If not, explain.


11. What percentage of the cost of meter connection installations does the purchaser of new construction pay? If this percentage is not consistent among HBA's members, describe the range.

12. For the calendar years 2007 through 2009 and from January through June of 2010, what is the average price of new construction sold in Boone County where a 5/8-inch x 3/4-inch meter connection is required? Where a 1-inch meter connection is required?

13. In HBA's motion to intervene in this matter, it states that, if allowed full intervention, it will present issues and develop facts that assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings. Identify those issues and expand upon any facts that may assist the Commission in this matter.

14. In HBA's motion for suspension of the proposed rate, HBA states that Boone District's application does not satisfy the technical requirements of 807 KAR 5:00(10) [sic]. State the technical requirement that Boone District has not met in its application.

15. In HBA's motion for suspension of the proposed rate, HBA states that Boone District's proposed increases are not fair, just or reasonable, given the goods and services provided by Boone District. Explain.



Jeff Derouen
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DATED: JUL 13 2010

cc: Parties of Record

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