

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

WILMER AND PAULINE CONN)	
)	
COMPLAINANTS)	
)	CASE NO.
V.)	2010-00049
)	
FLEMING COUNTY WATER ASSOCIATION)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST SET OF INFORMATION
REQUESTS TO FLEMING COUNTY WATER ASSOCIATION

Fleming County Water Association ("FCWA"), pursuant to 807 KAR 5:001, shall file with the Commission the original and ten copies of the following information. The information requested herein is due on or before September 24, 2010. 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.

FCWA 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 FCWA fails or refuses to furnish all or part of the requested information, FCWA 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 its legibility. 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. a. State the amount of money that FCWA reimbursed Roscoe Johnson when FCWA disconnected service to his property in 1997.

b. Explain how FCWA determined the amount that it reimbursed Mr. Johnson.

c. How much did Mr. Johnson, or his predecessors, pay to FCWA for the establishment of water service to his property at 1860 Rock Lick Creek Road?

2. a. Identify the total number of customers near the Maxey Flats site that received reimbursement from FCWA after it disconnected service in 1997.

b. Identify the total amount of money that was reimbursed to all customers identified in 2(a).

c. Explain how the amount in 2(b) was calculated.

3. a. State whether FCWA's disconnected portion of water line near Maxey Flats is separated from FCWA's distribution system or whether the line has been valved off.

b. Provide a detailed drawing showing how the end of the line is valved, including the blow-off assembly.

4. a. Explain all actions that would be required to restore service to 1860 Rock Lick Creek Road through the water line that was disconnected in 1997.

b. Identify the monetary costs to accomplish those actions.

5. a. State whether anyone resides along FCWA's portion of water line near the Maxey Flats site that was disconnected in 1997.

b. If there are residents along that water line and to the extent that FCWA knows, state how those residences have potable water.

c. State whether any of those residents have requested water service from FCWA since 1997.

6. Provide a copy of the consent decree that was entered in Civil Action No. 95-98 in the U.S. District Court for the Eastern District of Kentucky. Identify or highlight all sections that relate to the disconnection of service by FCWA near the Maxey Flats site.

7. Identify what person or entity currently owns FCWA's water line that was disconnected in 1997.

8. Provide a copy of all contracts, agreements, or other documents that evidence FCWA's release or transfer of its water line in 1997.

9. State whether FCWA has a utility easement for properties situated along the disconnected portion of its water line near the Maxey Flats site.

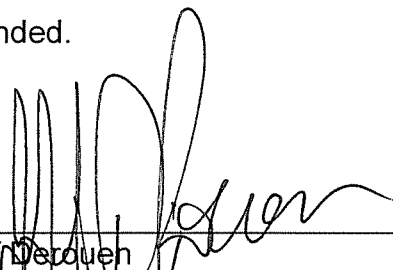
10. Provide copies of all documents that indicate FCWA is prohibited from constructing a water line along Rock Lick Creek Road to serve 1860 Rock Lick Creek Road.

11. Provide a map depicting how FCWA proposes to serve 1860 Rock Lick Creek Road from Skaggs Lane. Include or describe the size of the meter and its placement.

12. Identify and estimate all costs for constructing a line from FCWA's distribution main on Skaggs Lane to serve 1860 Rock Lick Creek Road.

13. Explain to what extent FCWA has discussed with landowners along Skaggs Lane the granting of an easement to FCWA in order to serve 1860 Rock Lick Creek Road.

14. Identify when the water line that originally served 1860 Rock Lick Creek Road was constructed and how that project was funded.



Jeff Derouen
Executive Director
Public Service Commission
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DATED: SEP - 9 2010

cc: Parties of Record

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