

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

WILLIAM C. HILL)	
)	
COMPLAINANT)	CASE NO.
)	2017-00316
V.)	
)	
MUHLENBERG COUNTY WATER DISTRICT)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO MUHLENBERG COUNTY WATER DISTRICT

Muhlenberg County Water District ("Muhlenberg District"), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due on or before May 7, 2018. Responses to requests for information in paper medium 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.

Muhlenberg District shall make timely amendment to any prior response if it obtains information that 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 Muhlenberg District 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 filing a paper containing personal information, Muhlenberg District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Muhlenberg District's November 30, 2017, Answer to Complaint. With the understanding that Muhlenberg District has not performed or hired a licensed engineer to perform any studies on connecting its water system to William C. Hill's, ("Mr. Hill") property, using institutional knowledge, describe the procedures that Muhlenberg District proposes to use to provide water service for Mr. Hill, including a detailed listing of prices and items to be paid by Mr. Hill, by Muhlenberg District, and prices or items or services which are anticipated to be provided by Todd County Water District ("Todd County").

2. Provide all internal memorandums, policy statements, correspondence, and documents related to providing service to Mr. Hill's property located near McPherson Road.

3. Refer to Todd County's March 27, 2018 Response to Commission Letter ("Todd County's Response") filed April 2, 2018.

a. Provide the rates for Muhlenberg District to purchase water from Todd County at a metering point near the Todd/Muhlenberg County line.

b. Provide all costs that will be incurred by Muhlenberg District to place a metering point at this location.

4. Refer to Muhlenberg District's November 30, 2017 Answer to Complaint, paragraph 14. Also, refer to Todd County's Response.

a. Describe in detail the difference in the cost between the proposal that Mr. Hill obtain service from a metering point near the Todd County line and the cost Muhlenberg District would incur extending their line from the Muhlenberg District main located on Kentucky Highway 181 South to Mr. Hill's property, as described in paragraph 14 of its November 30, 2017, Answer to Complaint.

b. Provide the cost of flushing a 4-inch line.

c. Provide the cost of flushing a 3-inch line.

d. Provide the projected cost if the line is first placed on Mr. Hill's property and later extended to the proposed 47 lot subdivision.

e. Provide the costs of extending a line from the proposed metering point in Item 3, above, to Mr. Hill's property.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED APR 27 2018

cc: Parties of Record

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