

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO SOUTHERN)	
WATER AND SEWER DISTRICT MANAGER DEAN)	CASE NO.
HALL ALLEGED FAILURE TO COMPLY WITH KRS)	2019-00084
278.160, KRS 278.170, KRS 278.300, 807 KAR)	
5:066, AND 807 KAR 5:095)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO NON-PARTY, SOUTHERN WATER AND SEWER DISTRICT

Southern Water and Sewer District (Southern District), a non-party to this proceeding, pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested is due within 14 days of the date of this request. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

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.

Southern District shall make timely amendment to any prior response if Southern District 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 Southern District fails or refuses to furnish all or part of the requested information, Southern District 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. When filing a paper containing personal information, Southern 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. According to media reports,¹ Utilities Management Group (UMG)² discovered that between 700 and 750 meters were reading zero water usage and another 200 meters are inactive.

a. Explain whether the 700 to 750 customers whose meters were reading zero received bills from Southern District prior to UMG's current management agreement, and, if so, whether those customers were billed for minimum water usage.

¹ See Floyd County Chronicle, "Loan Approved for Southern," http://www.floydct.com/news/loan-approved-for-southern/article_50695a0e-5223-11e9-92cb-d30abaaee8ea.html (Mar 29, 2019).

² Southern District entered into an emergency management agreement with UMG on March 25, 2019.

b. Explain what is meant by “inactive” meters.

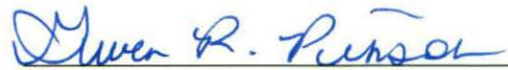
c. Explain whether there are customer accounts for the 200 meters that are inactive, and, if so, whether the customers received bills from Southern District prior to UMB’s current management agreement.

2. State whether UMG has identified meters that read zero water usage in addition to the 700 to 750 meters discussed above, and, if so, provide the number of meters in total that read zero.

3. State whether UMG has identified meters that are inactive in addition to the 200 meters discussed above, and, if so, provide the number of meters in total that are inactive.

4. State whether UMG has identified meters that are not recording actual water usage, other than meters that register zero or are inactive, and, if so, the total number of those meters.

5. Provide a list of all vehicles owned, leased, or transferred to Southern District since January 1, 2014. Include the make, model, and year of the vehicle; vehicle identification number; date vehicle was owned, leased, or transferred; whether vehicle is still in Southern District’s fleet; and, if the vehicle is no longer in Southern District’s fleet, the disposition of the vehicle and the date of disposition.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED APR 12 2019

cc: Parties of Record

Case No. 2019-00084

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