

Mr. Burrell shall make timely amendment to any prior response if Mr. Burrell obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Mr. Burrell fails or refuses to furnish all or part of the requested information, Mr. Burrell shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Mr. Burrell shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Identify any plumber hired to install the service line from the meter to your barn.
2. Identify the date the service line was installed from the meter to your barn.
3. Provide copies of any invoices received for or documentation reflecting work performed on your behalf to install the service line from the meter to your barn.
4. Refer to Farmdale Water District's answer filed January 20, 2023. Admit or deny the following allegations made by Farmdale Water District:
 - a. Mr. Burrell had someone who is not a licensed plumber install the service line from the meter to the barn;

b. The person who was backfilling the trench ran across it several times with a Bobcat (mini-excavator); and

c. This person caused the service line to be pushed down in the trench ultimately causing the pigtail to be “yanked out” from the meter setter.

5. State what was done to repair the water connection after the leak.
6. Identify any plumber hired to repair the water connection after the leak.
7. Provide copies of any invoices received for or documentation reflecting work performed on your behalf to the water connection after the leak.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED MAY 26 2023

cc: Parties of Record

Christopher S. Burrell
958 Ninevah Road
Frankfort, KENTUCKY 40601

*Honorable Damon R Talley
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Farmdale Water District
100 Highwood Drive, Route 8
Frankfort, KY 40601

*Felisa S. Moore
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Scott Wooldridge
Farmdale Water District
100 Highwood Drive, Route 8
Frankfort, KY 40601