## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:			
CHRISTOPHER SCOTT BURRELL COMPLAINANT		)	
		)	CASE NO.
V.		)	2022-00324
FARMDALE WATER DISTRICT		)	
	DEFENDANT	)	

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO FARMDALE WATER DISTRICT

Farmdale Water District (Farmdale District), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due on June 23, 2023. The Commission directs Farmdale District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

<sup>&</sup>lt;sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID- 19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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.

Farmdale District shall make timely amendment to any prior response if Farmdale District 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 Farmdale District fails or refuses to furnish all or part of the requested information, Farmdale 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 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Farmdale District shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

- 1. Refer to Farmdale Water District's answer filed January 20, 2023. State how Farmdale District obtained knowledge of the following facts alleged in its answer:
- a. Sometime prior to June 4, 2021, the Complainant had someone who is not a licensed plumber install the service line from the meter to the barn.

b. Following installation, the person who was backfilling the trench ran across it several times with a Bobcat (mini-excavator), forcing the service line to be pushed down in the trench ultimately causing the pigtail to be "yanked out" from the meter setter.

Linda C. Bridwell, PE Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED <u>MAY 26 2023</u>

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