

RECEIVED

JUN 23 2023

PUBLIC SERVICE
COMMISSION

Chris Burrell
Response CASE NO.
2022-00324

1. Company hired to perform service line install was Yount Utilities. During the initial board meeting I attended to discuss this matter, it was mentioned Yount Utilities had previously performed work for Farmdale Water District as a subcontractor.
2. Date service line installed 10/27/2020
3. See attached for invoice.
4. A. Yount Utilities installed service line from the meter to the barn.
B. Farmdale Water Board expressed opinion that the service was either forced into dug trench for the water line, or settled in trench after backfilling. The term "yanked loose" was used. However, Yount Utilities used a directional drill to bore for the water line, therefore there wasn't a trench to settle. Soil was excavated by Farmdale Water at the time of meter install around the meter vault. After connecting to the pigtail provided by Farmdale Water, there was no heavy equipment used in the backfill. There was no equipment driven over the filled soil.
5. Farmdale Water repaired the connection that was leaking. The repair took place at the meter/pigtail. No repair was needed at other connections.
6. No one was hired for the repair. Farmdale water corrected their loose connection.

Please let me know if I can be of further assistance into this matter.

Chris Burrell
958 Ninevah Road
Frankfort KY 40601

June 22, 2023

Contractors Invoice

WORK PERFORMED AT: Yount utilities

TO: BURRELL, CHRIS
958 WINEVAH
FRANKFORT KY 40601

6 TRACY CT
FRANKFORT KY 40601

DATE: 10-27-2020

YOUR WORK ORDER NO. _____

OUR BID NO. _____
TaxID# _____

DESCRIPTION OF WORK PERFORMED

Bored in water line for Building
placed in 2" pipe. \$1500

ok

Touyout
Pl cash

All Material is guaranteed to be as specified, and the above work was performed in accordance with the drawings and specifications provided for the above work and was completed in a substantial workmanlike manner for the agreed sum of _____

Dollars (\$ 1500⁰⁰/_{xx}).

This is a Partial Full invoice due and payable by: _____
Month _____ Day _____ Year _____

in accordance with our Agreement Proposal No. _____ Dated _____
Month _____ Day _____ Year _____

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

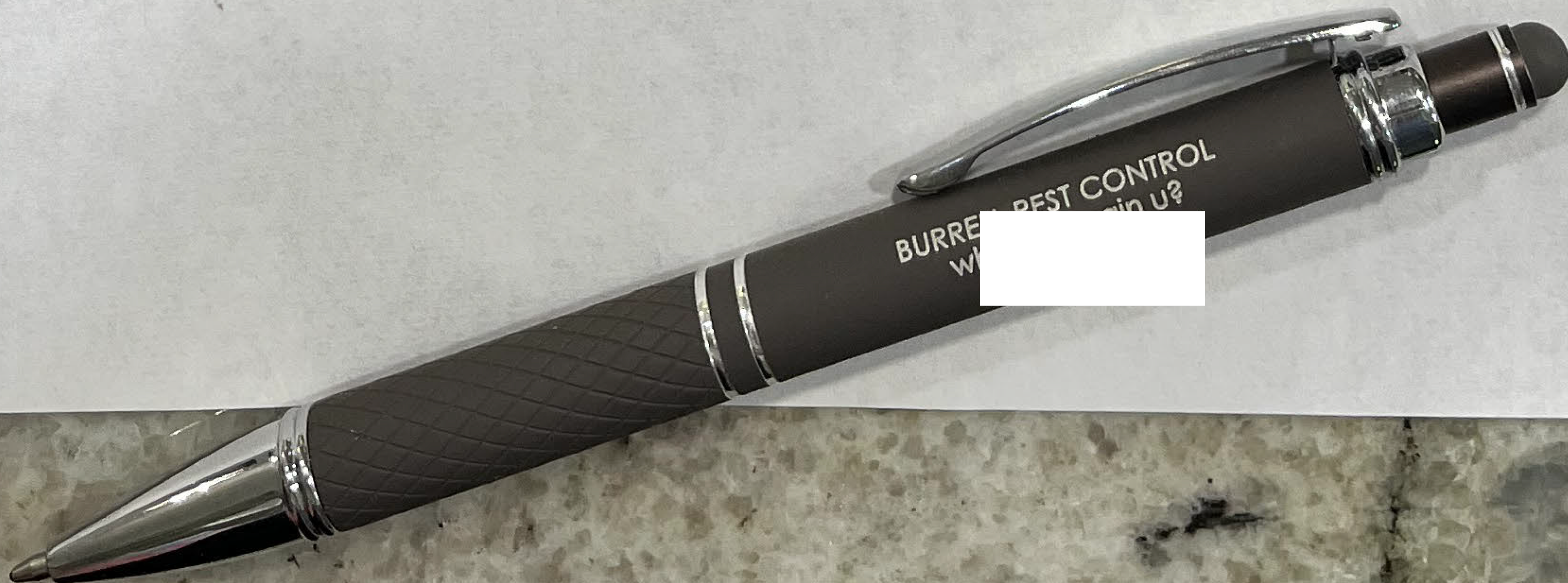
In the Matter of:

CHRISTOPHER SCOTT BURRELL)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2022-00324
FARMDALE WATER DISTRICT)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CHRISTOPHER SCOTT BURRELL

Christopher Scott Burrell, pursuant to 807 KAR 5:001E, is to file with the Commission the following information by either mailing the response to the Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky 40602, or by emailing the response to PSCED@ky.gov. The information requested is due on March 14, 2023.

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 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.



Mr. Burrell shall make timely amendment to any prior response if he obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Mr. Burrell fails or refuses to furnish all or part of the requested information, he 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, he 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

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 SECOND REQUEST FOR INFORMATION
TO CHRISTOPHER SCOTT BURRELL

Christopher Scott Burrell, pursuant to 807 KAR 5:001E, shall file with the Commission the following information by either mailing the response to the Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky 40602, or by emailing the response to PSCED@ky.gov. The information requested is due on June 23, 2023.

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 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.

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.

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

DATED FEB 17 2023

cc: Parties of Record