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June 23, 2023

RECEIVED  
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PUBLIC SERVICE  
COMMISSION

Ms. Linda C. Bridwell, P.E.  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602-0615

**Re: *Christopher Scott Burrell v. Farmdale Water District***  
**Case No. 2022-00324**

Dear Ms. Bridwell:

Please find enclosed Farmdale Water District's Response to the Commission Staff's First Request for Information. Should you have any questions, please contact me at your convenience.

Sincerely,

Stoll Keenon Ogden PLLC

A handwritten signature in blue ink that reads "Felisa S. Moore".

Felisa S. Moore

FSM  
Enclosure(s)

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

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

**RESPONSE OF**  
**FARMDALE WATER DISTRICT**  
**TO**  
**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**  
**DATED MAY 26, 2023**

**FILED: JUNE 23, 2023**


**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

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

**RESPONSE OF FARMDALE WATER DISTRICT  
TO COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION**

Comes Farmdale Water District (“Farmdale”) for its Response to Commission Staff’s First Request for Information, and states as shown on the following pages.

  
\_\_\_\_\_  
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*Counsel for Farmdale Water District*

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**


**In the Matter of:**

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

**CERTIFICATION OF RESPONSE OF FARMDALE WATER DISTRICT  
TO COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION**

This is to certify that I have supervised the preparation of Farmdale Water District’s Responses to Commission Staff’s First Request for Information. The response submitted on behalf of Farmdale Water District is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Date: June 23, 2023

  
\_\_\_\_\_  
Randall S. Wooldridge, Chairman  
Farmdale Water District

## CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on June 23, 2023. A copy of this Response has been mailed to the Complainant at the addresses listed on the Complaint.

  
\_\_\_\_\_

Damon R. Talley

**FARMDALE WATER DISTRICT**

**CASE NO. 2022-00324**

**Response to Commission Staff's First Request for Information**

**Question No. 1**

**Responding Witnesses: Randall S. Wooldridge, Chairman  
and Jamie Roberts, Water Manager**

**Q-1(a). 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.**

A-1(a). Mr. Burrell attended Farmdale District's Board of Commissioners' meeting on July 9, 2021 seeking relief from the Board. At that meeting, Mr. Burrell stated, "A buddy of mine helped me install the water line." There was no representation by Mr. Burrell that his "buddy" was a licensed plumber. The Farmdale Board members were left with the impression that Mr. Burrell's "buddy" was not a licensed plumber.

**Q-1(b). 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:**

**(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.**

A-1(b). At the July 9, 2021 Board meeting, Mr. Burrell admitted that he was the operator of the Bobcat (mini-excavator) and discussed how he ran over the line to "pack" it down.

On or about June 4, 2021, Jamie Roberts, who is the Water Manager for Farmdale District, and another Farmdale District employee observed water running down Ninevah Road. They stopped to investigate and determined that the water was coming from Mr. Burrell's meter or from his waterline next to the meter. Mr. Roberts turned the water off at the meter and notified Mrs. Burrell.

Within a few days, Mr. Roberts pumped the water out of the meter box and discovered that the pigtail had been "yanked out" from the meter setter.

Upon closer examination, the compression coupling that connected the pigtail to the meter setter was nowhere to be found. Based upon Mr. Roberts experience, he realized that it was not a situation where high pressure on the District's side of the meter had caused the pigtail to be

“blown out.” Instead, the pigtail had been “yanked out” from the meter setter. The only plausible explanation is that the force from running across the waterline with the Bobcat to “pack” the dirt in the trench caused the pigtail to be “yanked out” of the meter setter.