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February 4, 2025

Linda C. Bridwell, Executive Director
Kentucky Public Service Commission
211 Sower Blvd., PO Box 615
Frankfort, KY 40602-0615

Via Email: PSCED@ky.gov

In re: PSC Complaint
Case No. 2024-00262
Belden Gaines v. Bullock Pen Water District

Dear Ms. Bridwell:

Attached, please find Bullock Pen District's Response to Commission Staff's Second Request for Information with regard to Case No. 2024-00262. Should you have any questions regarding this filing, please feel free to call.

Very truly yours,

//s//Thomas R. Nienaber
THOMAS R. NIENABER

TRN/krp

cc: Bullock Pen Water District
Attention: Chairman Charles Givin

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BELDEN CRAIG GAINES)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2024-00262
)	
BULLOCK PEN WATER DISTRICT)	
)	
DEFENDANT)	

**BULLOCK PEN DISTRICT'S RESPONSE TO
COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION**

Comes now Bullock Pen Water District (Bullock Pen District) and submits the following Response to the Commission Staff's Second Request for Information.

1. Refer to Bullock Pen District's Response to Commission Staff's First Request for Information (Staff's First Request), Item 5b. Explain whether the manual reading of Mr. Gaines' meter required Bullock Pen District to physically access the unusually deep meter. If so, explain how Bullock Pen District accessed the meter.

Response:

A meter pit is generally between 3' and 4' deep. The meter face where meter readings are taken can visually be seen after lifting the meter lid. That is to say, it is not necessary to physically access a meter pit when making a meter reading. However, if a meter is damaged or needs maintenance, then it is necessary to physically access the meter pit by a service technician. This is generally achieved through leaning into the meter past the technician's waist. In Beldan Gaines situation, the meter could be read simply by removing the meter lid.

2. Identify the portion of Bullock Pen District's Tariff P.S.C. Ky No. 1, 1st Revised Sheet No. 30, pursuant to which Mr. Gaines was offered a water bill adjustment. Explain how the leak in this instance fits under said portion of the tariff.

Response:

Mr. Gaines was offered a bulk rate adjustment, which can be found in Section II (Rules and Regulations) Subsection V (leak adjustments) of the District's tariff. Mr. Gaines qualifies under the underground leaks that cannot be detected by ordinary methods. Mr. Gaines showed no negligence in causing the leak, therefore, he would be entitled to the adjustment.

3. Refer to Bullock Pen District's Response to Staff's First Request, Item 4. Provide the exact location of the leak discovered on June 26, 2024. Explain what steps were taken to address this leak.

Response:

The District did not determine the exact location of the leak discovered on June 26, 2024. The District service technician, when visually observing Mr. Beldan Gaines' meter noticed that the leak detector was turning, which indicates a leak on the customer's side of the meter. It was at that point that Mr. Gaines was notified he had a leak on his side of the meter. Mr. Gaines then took corrective action and repaired the leak. The District did not participate in any way in correcting Mr. Gaines' water line leak.

VERIFICATION

Comes now Bullock Pen District, through its Superintendent, Paul Harp, and states that he has reviewed the foregoing Responses to the Commission Staff's First Request for Information and that the statements contained therein are true and correct to the best of his knowledge and belief.

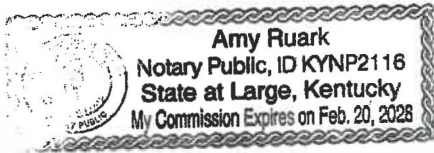
BULLOCK PEN WATER DISTRICT:

BY: 
PAUL HARP, SUPERINTENDENT

COMMONWEALTH OF KENTUCKY

COUNTY OF GRANT

Subscribed, sworn to, and acknowledged before me by Paul Harp, Superintendent, for and on behalf of Bullock Pen Water District, on this the 31st day of January, 2025.



Amy S. Ruark
NOTARY PUBLIC, State at Large
My Commission Expires: 2-20-28
Notary ID#: KYNP2116

CERTIFICATE

The undersigned counsel hereby certifies that a copy of Bullock Pen District's Answer to Commission Staff's Second Request for Information to Bullock Pen Water District was served on: Linda C. Bridwell, PE, Executive Director, Public Service Commission, P.O. Box 615, Frankfort, KY 40602, via email @ PSCED@ky.gov; and the Complainant, Belden Craig Gaines, at 5005 Warsaw Road, Dry Ridge, Kentucky, 41035, by depositing a copy thereof in the United States Mail, postage prepaid, this 4th day of February, 2025.

Respectfully submitted,

//s// Thomas R. Nienaber

THOMAS R. NIENABER, KBA #51820

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