

allegations support our further investigation into the merits of the complaint, including the number of breaks on water lines adjacent to the property, the cause of the break, and the date of repairs in the last four years.

The Commission finds that additional information is needed to assist the Commission in making a determination of whether the complaint establishes a *prima facie* case. Therefore, Northen Kentucky District should file its responses to Commission Staff's request for Information, attached to this Order as Appendix A, on or before the date set forth in the request.

A copy of Ron's Food Mart's complaint is attached to this Order as Appendix B to inform Northen Kentucky District of the subject of the complaint and to assist in identifying the associated account.

IT IS THEREFORE ORDERED that:

1. A copy of this Order shall be served on Northen Kentucky District for the sole purpose of requesting necessary documents to assist the Commission in determining whether the complaint establishes a *prima facie* case.
2. Northen Kentucky District shall respond to Commission Staff's request for Information as provided in Appendix A attached to this Order.
3. Northen Kentucky District shall respond to any additional requests for information propounded by Commission Staff, as provided in those requests.
4. A copy of this Order shall be served on the Complainant, Ron's Food Mart Covington, by U.S. Postal Service, First-Class Mail, at 332 Greenup Street, Covington, Kentucky 41011.


5. All responses filed by Northern Kentucky District shall also be mailed to the complainant at the address set forth in ordering paragraph 3.

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PUBLIC SERVICE COMMISSION



Chairman



Commissioner



Commissioner

ATTEST:

 *AP*

Executive Director

ENTERED
MAR 21 2025 AH
KENTUCKY PUBLIC
SERVICE COMMISSION

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2025-00050 DATED MAR 21 2025

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO NORTHERN KENTUCKY WATER DISTRICT

Northern Kentucky Water District (Northern Kentucky District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 28, 2025. The Commission directs Northern Kentucky 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 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.

Northern Kentucky District shall make timely amendment to any prior response if Northern Kentucky District obtains information that indicates the response was incorrect

¹ 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).

or incomplete when made or, though correct and complete when made, is now incorrect or incomplete in any material respect.

For any request to which Northern Kentucky District fails or refuses to furnish all or part of the requested information, Northern Kentucky 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, Northern Kentucky District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide copies of all records for the years 2020 through 2025 concerning installation, removal, replacement, repair, and maintenance of all water lines within a one block radius to Ron's Food Mart Covington, 332 Greenup Street, Covington, Kentucky 41011, to include date and cause of any line breaks, length of leak or rupture, date of repair, complaints arising therefrom, and any property damage alleged to have arisen as a result of the work.

2. All other information that Northern Kentucky District deems relevant to the matters raised in Ron's Food Mart Complaint attached as Appendix B.

APPENDIX B

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2025-00050 DATED MAR 21 2025

TWO PAGES TO FOLLOW

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

NOV 25 2024

PUBLIC SERVICE
COMMISSION

In the matter of:

Richard Landrum (owner))

Ron's Food Mart Covington)

COMPLAINANT)

VS.)

Northern Kentucky Water Services)

2835 Crescent Springs Pike)

Erlanger KY 41018)

DEFENDANT)

COMPLAINT

The complaint of Richard Landrum respectfully shows:

(a) Ron's Food Mart Covington
332 Greenup Street
Covington Kentucky 41011

(b) Northern Kentucky Water Services
2835 Crescent Springs Pike
Erlanger KY 41018

(c) That: The water main adjacent to my business property keeps rupturing. (2 times in the last 4 years).
There is no plan to replace the pipe, they just keep patching it.
So far, in 2021 I spent \$28,505.29 on repairs for the 1st rupture. My business was closed for 5 days costing me \$5144.00.

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Formal Complaint
Richard Landrum vs. Northern Kentucky Water Services
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The current repairs in 2024 are estimated to cost between \$25,000 & \$40,000.

The repair costs are for replacing blacktop & concrete.

The second concern is about potential damage to my underground fuel tanks and piping.

I operate a gasoline station with 6 pumps.

If a rupture damages this equipment, I will have huge cleanup costs & will not be able to sell gasoline.

This scenario will likely put me out of business.

The Water District tells me they have no liability for any of these issues caused by their obsolete pipe.

Wherefore, complainant asks for financial help from the Water District with the current 2024 repairs and reimbursement for the costs resulting from the 2020 event.

The complainant also requests a plan from the Water District focusing on replacing this aging pipe.

Finally, the complainant requests a contingency plan from the Water District describing the Water District's response to a fuel spill resulting from any future damages caused by this water main.

Dated at Covington Kentucky, this Friday the 20th of November, 2024



Richard Landrum Owner

Ron's Food Mart Covington

Richard Landrum
Ron's Food Mart Covington
332 Greenup Street
Covington, KENTUCKY 41011

*Northern Kentucky Water District
2835 Crescent Springs Road
P. O. Box 18640
Erlanger, KY 41018-0640