

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO	)	
SOUTHERN WATER & SEWER DISTRICT AND	)	
ITS INDIVIDUAL COMMISSIONERS (BOB	)	CASE NO.
SHEPHERD, DONNIE DANIELS, RICK	)	2025-00233
ROBERTS, STEVE DAWSON, AND LESLIE	)	
BYRON SCOTT) FOR ALLEGED ASSESSMENT	)	
OF AN UNAPPROVED RATE	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO SOUTHERN WATER AND SEWER DISTRICT

Southern Water and Sewer District (Southern 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 October 14, 2025. The Commission directs Southern District to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<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).

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.

Southern District shall make timely amendment to any prior response if Southern 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 Southern District fails or refuses to furnish all or part of the requested information, Southern District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Southern District's September 1, 2025 response (Response) to the Commission's August 15, 2025 Order states that "should the Commission require factual information regarding the 'disconnect/service call investigation charge,' the questions should be directed to [Southern District's management group], UMG".<sup>2</sup> Southern District is cautioned that for any request for information appropriately issued in a case before the Commission, it is the responding party's responsibility to find the information through whatever channels it deems necessary, and that failure to fully respond or direct the Commission to other parties, especially those who are actively involved with the utility, could be construed as a possible violation of 807 KAR 5:001, Section 4(d)5.

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

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<sup>2</sup> Southern District's Response (filed Sept. 1, 2025) at 1.

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, Southern 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 2025 training records for each current commissioner, if available. If not available, state whether each commissioner is attending training later this year or does not have plans to attend training.

2. Provide a document that establishes the appointment date of Randy Conley in his current role as Manager of the Southern District.

3. Provide training records and certifications obtained by Randy Conley since assuming the role of Manager for the Southern District.

4. Provide the total number of occurrences and dollar amounts for the disconnect charges that were recorded in each calendar year beginning with initiation of the charge on October 4, 2022.<sup>3</sup> For the occurrences stated in the response:

a. Provide the total number of occurrences and dollar amounts for customers that have an active account with Southern District.

b. Provide the total number of occurrences and dollar amounts for customers that no longer have an active account with Southern District.

5. Refer to Southern District's September 1, 2025 Response, Southern's Response to Disconnect Fee 25-233, that states Southern District has

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<sup>3</sup> Case No. 2024-00251, *Electronic Application of Southern Water and Sewer District for an Alternative Rate Adjustment Pursuant to 807 KAR 5:076* (filed May 8, 2025), Southern District's Response to Commission Staff's Third Request for Information, Item 13.

counseled UMG that no fee/charge shall be collected that is not specifically listed in Southern District's Tariff. State what other actions Southern District will take to ensure that its contracted management Company, UMG, adequately communicates all proposed changes to the Southern District Commissioners for their review and authorization prior to implementation.



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Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED **SEP 29 2025** \_\_\_\_\_

cc: Parties of Record

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