

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.

Continued on Next Page

Formal Complaint
Richard Landrum vs. Northern Kentucky Water Services
Page 2 of 2

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