

RECEIVED AUG 28 2025

PUBLIC SERVICE COMMISSION

August 28, 2025

Linda Bridwell, P.E. Executive Director Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602-0615

RE: Case # 2025-00238

Dear Ms. Bridwell:

The Northern Kentucky Water District hereby submits the enclosed response to Commission Staff's Request for Information. If you have any further questions or need additional information, please feel free to contact me.

Respectfully Submitted,

Tom Edge, Esq. (KBA #95534)

General Counsel

Director of Compliance, Communications and Regulatory Affairs

Phone - 859-578-5457

Email: tedge@nkywater.org

enclosure

cc: Mr. Carl Knochelmann Jr., 3032 Belle Meade Lane, Edgewood, Kentucky 41017

#### COMMONWEALTH OF KENTUCKY

#### BEFORE THE PUBLIC SERVICE COMMISSION

III tile matter or.	In	the	Matter	of:
---------------------	----	-----	--------	-----

CARL E. KNOCHELMANN JR.	)
COMPLAINANT	) CASE NO. 2025-00238
V.	)
NORTHERN KENTUCKY WATER DISTRICT	)
DEFENDANT	)

### RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

Comes now the Northern Kentucky Water District ("NKWD") and submits its responses to the Commission Staff's Request for Information dated August 12, 2025.

RESPECTFULLY SUBMITTED:

Tom Edge, Esq. (KBA #95534)

General Counsel

Cassandra Zoda, Esq. (KBA #96871)

Contracts, Claims and Procurement Coordinator

Northern Kentucky Water District

2835 Crescent Springs Rd.

Erlanger, KY 41018

Phone - 859-578-5457

Fax - 859-426-2770

Email: <u>tedge@nkywater.org</u>

czoda@nkywater.org

Counsel for Northern Kentucky Water District

#### **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on August 28, 2025 and a copy was mailed to Mr. Carl Knochelmann Jr. at 3032 Belle Meade Lane, Edgewood, Kentucky 41017.

Tom Edge, Esq. (KBA #95534)

### NORTHERN KENTUCKY WATER DISTRICT

# Response to Commission Staff's First Request for Information

# CASE NO. 2025-00007

# WITNESS - Barry Miller, Customer Service Manager

- Q.1. Provide a copy of results of any meter tests performed on the meter identified in Mr. Knochelmann's complaint, whether on the date identified by Mr. Knochelmann or any other date before or after.
- **A.1.** NKWD states the meter was tested on January 25, 2023 in accordance with 807 KAR 5:066 and submits the attached Exhibit 1-A in support.

# Exhibit 1- A

# **Northern Kentucky Water District**

REPORT OF METER TEST AND REPAIRS

5/8	BA	.lger	ger DISD. 36333180				
		ر. 	METER	READING			
		RECEIVED		<del> </del>	AFTER	REPORT.	5
0	56	757		1	·		
STOPPE	D I FI		SON FOR	TEST OR	COMP		PER. TEST
	i						
			1		l		
HER:							
PACITY							
TE MET	ER LAS	T RECON	DITIONED				
co		N AS REC	EIVED	CO		AFTER R	EPAIRS
RATE	QU	ANTITY	RESULT	RATE:	QUA	NTITY	   RESULT
. Р. М. Р	AT	GALS.	_ L /0/\	G, P. M.	AT	GALS.	
1/4	AT	1/	1995		AT		
2	AT	1_1	199.5		AT		
15	ΑT	10	199.72	-	AT		
İ	AT		1		AT .	}	
NOTION O	OF:						
MILIER FII			REPAIR F	PARTS US	ED		
				*			
* -				_			
							20 -
							"O - P
RE	PAIRE	D BY	DATE	- <del> </del>	TESTED	ВҮ	DATE
					149		1/25/
			REI	MARKS			

### NORTHERN KENTUCKY WATER DISTRICT

# Response to Commission Staff's First Request for Information

# CASE NO. 2025-00007

# WITNESS - Barry Miller, Customer Service Manager

- Q.2. State when the identified meter was placed into service at Mr. Knochelmann's service location.
- **A.2.** NKWD states the meter tested on January 25, 2023 was initially put into service at Mr. Knochelmann's service address of 3032 Belle Meade Lane, Edgewood, Kentucky 41017 on May 13, 2020.

### AFFIDAVIT OF BARRY MILLER

COMMONWEALTH OF KENTUCKY	)
	)SS
COUNTY OF KENTON	)

Comes now affiant, Barry Miller after being first sworn, deposes, and states that he is the Customer Service Manager for the Northern Kentucky Water District, that he is authorized to submit these Responses on behalf of Northern Kentucky Water District, and that the information contained in the Responses is true and correct to the best of his knowledge and belief, except as to those matters that are based on information provided to him and, as to those, he believes that information to be true and correct.

Barry Miller

This instrument was acknowledged, signed and declared by Barry Miller to be his act and deed the 28th day of August 2025.

Notary Public, Kentucky at Large

Notary ID Number:\_

My Commission Expires:\_