

**DAMON R. TALLEY, P.S.C.**

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DAMON R. TALLEY

ATTORNEY AT LAW

April 14, 2005

Ms. Beth O'Donnell  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

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APR 18 2005

PUBLIC SERVICE  
COMMISSION

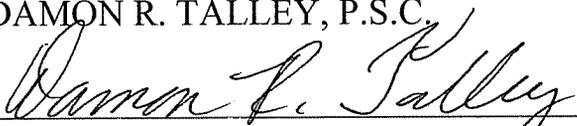
RE: Adams & Vaughn Complaint  
Case No. 2005-00008  
Garrard County Water Association, Inc.

Dear Ms. O'Donnell:

Enclosed for filing are the original and four (4) copies of the Response of Garrard County Water Association, Inc. to the Data Request of Commission Staff.

Yours truly,

DAMON R. TALLEY, P.S.C.

  
DAMON R. TALLEY, ATTORNEY FOR  
GARRARD COUNTY WATER  
ASSOCIATION, INC.

DRT:ms

Enclosures

cc: Garrard County Water Association, Inc.  
Danny Ray Adams  
Calvin Vaughn

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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DANNY RAY ADAMS AND  
CALVIN VAUGHN

COMPLAINANTS

v.

GARRARD COUNTY WATER ASSOCIATION, INC.

DEFENDANT

CASE NO. 2005-00008

**RESPONSE OF**  
**GARRARD COUNTY WATER ASSOCIATION, INC.**  
**TO DATA REQUEST OF COMMISSION STAFF**

Comes the Garrard County Water Association, Inc. ("Garrard Water"), by Counsel,  
and for its Response to the Data Request of Commission Staff, states as follows:

Question 1. In regard to the Answer to Complaint, page 2, No. 6, "or sponsoring a distribution line extension project to extend a distribution line to the edge of his property."

a. If Danny Ray Adams agrees to "sponsor a distribution line extension project," will the new distribution line be located in the same easement as the proposed service line (through the easement that Calvin Vaughn has granted to Mr. Adams)?

**Answer:** No. The easement that Calvin Vaughn granted Mr. Adams on November 25, 2003, but which was not recorded until March 17, 2005, appears to grant Mr. Adams the right to install a water line on the east side of Vaughn Way (a private road). The easement does not lead from Vaughn Way to Mr. Adams' property. Mr. Adams' property is approximately 275 feet west of Vaughn Way.

b. If yes,

(1) What is the length of the proposed distribution line?

**Answer:** N/A

(2) What are the benefits to the utility of locating a distribution line in an easement as opposed to locating a customer's service line in the easement?

**Answer:** N/A

(3) What will the cost of this extension be to the utility?

**Answer:** N/A

(4) What will the cost be to the customer?

**Answer:** N/A

c. If no,

(1) Where will the distribution line extension be located?

**Answer:** The distribution line extension would commence on the east side of Vaughn Way on Mr. Vaughn's property between Vaughn Way and Kentucky Highway 1295 where Garrard Water's existing water distribution line is located. The line would go under Vaughn Way and would extend west approximately 275 feet to Mr. Adams' land. It would be located on either Mr. Rinthen's land or on the Garrard County Fire District's land.

(2) What is the length of the distribution line extension?

**Answer:** Approximately 275 feet.

(3) What will the cost of this extension be to the utility?

**Answer:** The total cost is estimated to be \$6,560. See the cost estimate attached hereto and incorporated herein by reference as Exhibit A. Garrard Water will be responsible for the cost of 50 feet which is estimated to be \$1,193 ( $\$6,560 \div 275 \text{ feet} = \$23.85 \text{ per foot} \times 50 \text{ feet} = \$1,193$ ).

(4) What will the cost be to the customer?

**Answer:** \$5,367 ( $\$6,560 \text{ less } \$1,193 = \$5,367$ ).

Question 2. In regard to Mr. Adams' property:

a. Does Mr. Adams' property border any road (does it have any road frontage)?

**Answer:** No

b. If yes,

(1) Does that road have an existing distribution line?

**Answer:** N/A

(2) How far is the existing distribution line to the customer's property?

**Answer:** N/A

(3) What would be the required length of the service line?

**Answer:** N/A

(4) What will the cost of this proposal be to the utility?

**Answer:** N/A

(5) What will the cost be to the customer?

**Answer:** N/A

Question 3. In regard to locating Mr. Adams' meter near the existing distribution line on Highway 1295 (either on Mr. Vaughn's property or on the highway right-of-way) and locating a service line in the easement granted by Mr. Vaughn.

a. What would be the required length of the service line?

**Answer:** The service line cannot be located in the easement granted by Mr. Vaughn because the easement does not extend from Vaughn Way to Mr. Adams' property. There

is a gap of approximately 275 feet. Mr. Rinthen's land is between Vaughn Way and Mr. Adams' land. (See Answer to Question 1a). The distance from Vaughn Way to Mr. Adams' land is approximately 275 feet.

b. What will the cost of this proposal be to the utility?

**Answer:** There would be no up-front cost to Garrard Water.

c. What will the cost be to the customer?

**Answer:** Unknown. The cost of trenching and installation of the service line depends on the amount of rock encountered and the quality and size of the service line selected by Mr. Adams.

Question 4. a. As it stands right now, does the utility see any way for Mr. Adams to obtain water service other than purchasing additional land?

**Answer:** Yes

b. If yes,

(1) What are the options?

**Answer:** If someone can obtain an easement from either Mr. Rinthen or the Garrard County Fire District, then a three (3) inch distribution line can be extended from Vaughn Way to Mr. Adams' property.

(2) What will the cost of these options be to the utility?

**Answer:** \$1,193. See Answer to Question 1c(3).

(3) What will the cost be to the customer?

**Answer:** Initially, Mr. Adams would be required to pay \$5,367. Over the next 10 years, however, he would receive a refund in the amount of \$1,193 (the cost of 50 feet) each time an additional customer connected to the distribution line extension.

Respectfully Submitted,

**DAMON R. TALLEY, P.S.C.**



DAMON R. TALLEY

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ATTORNEY FOR GARRARD COUNTY  
WATER ASSOCIATION, INC.

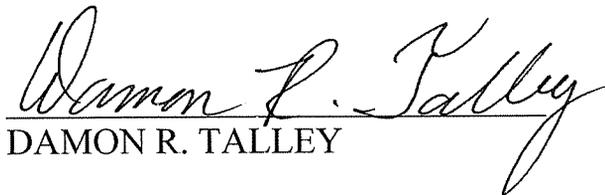
**CERTIFICATE OF SERVICE**

This is to certify that I have mailed a true copy of the foregoing pleading this 15<sup>th</sup>  
day of April, 2005, to the following:

Danny Ray Adams  
1455 Perry Rogers Road  
Lancaster, KY 40444

Harold C. Ward  
Garrard County Water Association, Inc.  
P. O. Box 670  
Lancaster KY 40444-0670

Calvin Vaughn  
142 Vaughn Way  
Lancaster, KY 40444



DAMON R. TALLEY

**COST ESTIMATE - ADAMS - VAUGHN WAY**

1. 275 Feet - 3" PVC CL200 waterline trenched, backfilled and finish cleanup @ \$6.00/ft	\$1,650.00
2. 20 - Feet - Hwy crossing with 6" steel casing, bored and jacked @ \$100.00	2,000.00
3. 4" x 3" tapping sleeve & valve	950.00
4. 3" blowoff valve	350.00
5. 40 ton - crushed stone - driveway & pipe bedding @ \$10.00	400.00
6. 36 lbs. -- Misc. DI fitting @ \$2.50	90.00
<b>TOTAL CONSTRUCTION</b>	<b>\$5,440.00</b>
Engineering, plan sheets and hydraulics	350.00
Division of Water plan review fee	150.00
Project inspection and control	320.00
Administrative cost	150.00
Contingency	150.00
<b>TOTAL PROJECT ESTIMATE</b>	<b>\$6,560.00</b>