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COMMISSION

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December 28, 2012

**VIA HAND DELIVERY**

Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40601

***RE: In the Matter of: Application of Jessamine-South Elkhorn Water District for a Certificate of Public Convenience and Necessity to Construct and Finance a Waterworks Improvement Project Pursuant to KRS 278.020 and 278.300 – Case No. 2012-00470***

Dear Mr. Derouen:

Enclosed please find and accept the original and ten copies of Forest Hills Residents' Association, Inc.'s and William Bates' Objections to the Supplemental Requests for Information propounded by Jessamine-South Elkhorn Water District.

Please acknowledge receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copy and return them to me. Should you have any questions please contact me at your convenience.

Sincerely,

Stoll Keenon Ogden PLLC

Monica H. Braun

**JESSAMINE-SOUTH ELKHORN WATER DISTRICT**  
**CASE NO. 2012-00470**  
***FOREST HILLS RESIDENTS' ASSOCIATION, INC.'S AND WILLIAM BATES'***  
***RESPONSE TO JESSAMINE-SOUTH ELKHORN WATER DISTRICT'S***  
***SUPPLEMENTAL REQUESTS FOR INFORMATION***

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**Witness: Counsel / William Bates**

9. Provide details of any and all communications, conversations or discussions between the Intervenor, or any contractors, agents or representatives of the Intervenor and any officials, agents, contractors or representatives of Kentucky American Water Company ("KAWC"), that involve any reference whatsoever to this Application, the Intervenor's prior complaint in Case No. 2011-00138, or any other issue or aspect related to the subject water tank, including the dates, participants and subjects of such communications, conversations and discussions. Included in the response should be any documents, electronic conversations or other written documents that in any way reference this case. Should any claim of privilege be asserted, the Intervenor should state the date and nature of the contact and the full rationale and basis asserted for such a privilege.

**Response:**

Objection. Information regarding communications or the lack of communications between counsel for Intervenor and other persons that occurred in anticipation of, or preparation for, this proceeding are protected from disclosure by the work product doctrine. Without waiving the foregoing objection, Intervenor will provide responsive information not protected by the work product doctrine on January 2, 2013.

**JESSAMINE-SOUTH ELKHORN WATER DISTRICT**  
**CASE NO. 2012-00470**  
***FOREST HILLS RESIDENTS' ASSOCIATION, INC. 'S AND WILLIAM BATES'***  
***RESPONSE TO JESSAMINE-SOUTH ELKHORN WATER DISTRICT'S***  
***SUPPLEMENTAL REQUESTS FOR INFORMATION***

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**Witness:**      **Counsel / William Bates**

11.      Provide details of all assistance, if any, which has been provided or is planned to be provided by KAWC to the Intervenors or residents and owners in the Forest Hills Subdivision or their representatives in preparing or pursuing the Intervenors' position in this proceeding or in preparing and pursuing the interest that the Intervenors asserted in PSC Case No. 2011-00138. As used herein, "assistance" includes financial, technical, consulting, advice or any other form of assistance.

**Response:**

Objection. Information regarding assistance or the lack of assistance sought or obtained by counsel for Intervenors from other persons that occurred in anticipation of, or preparation for, this proceeding is protected from disclosure by the work product doctrine. Without waiving the foregoing objection, Intervenors will provide responsive information not protected by the work product doctrine on January 2, 2013.

**JESSAMINE-SOUTH ELKHORN WATER DISTRICT**  
**CASE NO. 2012-00470**  
***FOREST HILLS RESIDENTS' ASSOCIATION, INC.'S AND WILLIAM BATES'***  
***RESPONSE TO JESSAMINE-SOUTH ELKHORN WATER DISTRICT'S***  
***SUPPLEMENTAL REQUESTS FOR INFORMATION***

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Dated: December 28, 2012

Respectfully submitted,

Robert M. Watt, III  
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monica.braun@skofirm.com

By: Monica H. Braun  
Counsel for Intervenors

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing pleading has been served by e-mail and by mailing a copy of same, postage prepaid, to the following person on this the 28th day of December 2012:

Bruce E. Smith, Esq.  
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Monica H. Braun  
Counsel for Intervenors