

COMMONWEALTH OF KENTUCKY  
BEFORE THE  
PUBLIC SERVICE COMMISSION

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MAY 03 2013

PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF:

CLARK MCCOY; DEBBIE MCCOY;	)	
DAVID VARGO; PATRICIA VARGO;	)	
MIKE COCHRAN; IRENE COCHRAN; AND	)	
DARRELL OWENS	)	PETITIONERS
	)	CASE No.
	)	2013 -
	)	00092
VS:	)	
	)	
MOUNTAIN WATER DISTRICT	)	RESPONDENT

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**Mountain Water District's First Data Request to Petitioners**

Respondent, Mountain Water District, by and through counsel, pursuant to the Commission's order of April 18, 2013 submits the following data requests to Petitioners. Any reference to the term "you" is used to refer to each Petitioner individually.

1. What is your current waste water treatment system?
  - a. How long has it been in operation?
2. What issues are you having with your current waste water system that now would require you to obtain public wastewater treatment services, and if any, when did those issues arise?
3. Please provide the date and name under which you have asked for wastewater treatment services from the Respondent?

a. Provide the dates you attended meetings of the Mountain Water District Board to express a desire for expanded wastewater treatment facilities.

b. Provide all correspondence to and from Mountain Water District related to your request for wastewater service.

4. How do you define "recognizable progress" in the provision of waste water treatment services to the Belfry Pond Creek area as set out in your complaint?

a. Given Mountain Water District's actions to investigate and pursue additional wastewater treatment options over the last several years, what options has it failed to consider?

5. Please identify any existing health hazards that you believe are being created by the use of your current wastewater systems?

a. Was your current wastewater treatment system inspected by a local regulatory agency and approved for use? When was the last inspection?

b. Have you been cited by any agency for illegal discharges from the existing wastewater treatment systems? If yes, provide the notices or citations.

6. Please explain in detail how your existing treatment system is contaminating the local water supply?

a. If there is contamination from your existing system into the water supply, is that the result of lack of maintenance, age of system or other correctable defect? Explain in detail the source and cause of the contamination.

7. Please explain in detail the basis of your allegation that the money that has been set aside for the Belfry Pond Creek sewer system that has not yet been spent is an unwise and unproductive use of said funds?

a. Explain in detail the most productive use of those funds that you believe should have been made.

b. Please identify, describe in detail and provide all facts and documents regarding any cost analyses performed by you for any alternative site considered for the construction of the wastewater expansion. Each analysis should include all cost estimates, identify the sources of the cost information, describe all assumptions used to develop the analysis and include any supporting documentation.

8. Please explain the basis of your position that the current system could be extended and where the treatment for wastewater would be done for such extension?

9. Provide all studies, reports or other information that you have prepared or have reviewed that support the need for additional wastewater treatment facilities in the Belfry Pond Creek area.

a. What additional sites for the location of a wastewater treatment facility have you investigated or determined to be a suitable location for a wastewater treatment facility?

10. Provide all studies, reports or other information that you have prepared or reviewed that support your allegation that Mountain Water District could enlarge or extend its wastewater treatment facilities to serve you.

11. Provide all studies, reports or other information that you have prepared or reviewed which identify property subject to condemnation by Mountain Water District that is feasible for locating a wastewater treatment facility.

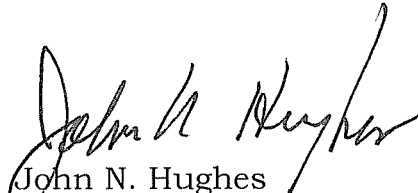
12. Please produce all documents containing or relating to studies, reports or other written documentation of any problems associated with the wastewater treatment facilities of Mountain Water District since January 1, 2006.

13. Please identify any and all witnesses that you plan to call to testify on your behalf along with a summary of the substance of each witness's expected testimony and identify all documents and exhibits that you plan to introduce in support of your position at the hearing of this matter.

Submitted By:

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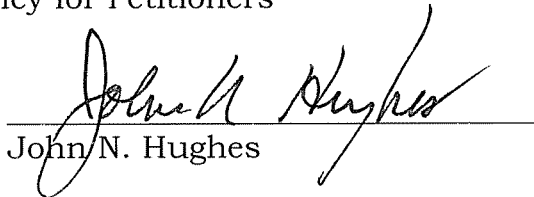
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#### CERTIFICATE OF MAILING

This is to certify that a copy of the foregoing was served on Petitioner's attorney by first class mail on May 3<sup>rd</sup>, 2013:

Christian R. Harris, Esq.  
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Attorney for Petitioners



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John N. Hughes