

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:

APPLICATION OF JESSAMINE-SOUTH)
ELKHORN WATER DISTRICT FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE AND) CASE NO.
NECESSITY TO CONSTRUCT AND FINANCE A) 2014-00084
WATERWORKS IMPROVEMENT PROJECT)
PURSUANT TO KRS 278.020 AND 278.300)

ATTORNEY GENERAL'S REPLY TO APPLICANT'S RESPONSE AND
WRITTEN STATEMENT REGARDING THE REQUEST FOR HEARING

Comes now the Attorney General of the Commonwealth of Kentucky ("AG"), by and through his Office of Rate Intervention, and pursuant to 807 KAR 5:001 Section 5(3) files his Reply to the most recent Response by the Applicant as well as his Written Statement regarding the Request for Hearing filed in the instant matter by Forest Hills Residents' Association, Inc. and T. Logan Davis.

The Attorney General shares the concerns expressed by Applicant, Jessamine-South Elkhorn Water District, regarding the need for a hearing to address matters that have already been placed on record with the Commission and incorporated by reference in this proceeding. Further, of concern to the Attorney General is the possibility that additional delay and mounting litigation costs associated with addressing duplicative issues, or conducting a hearing that would do so, will unnecessarily and disproportionately burden the ratepayers who are not represented by

Forest Hills. Moreover, the Attorney General states that his office has not independently sought a hearing in this matter nor does it intend to do so.

WHEREFORE, the Attorney General respectfully requests that the Commission consider the factual and legal arguments as well as the statements of Attorney General provided herein.

Respectfully submitted,

JACK CONWAY
ATTORNEY GENERAL



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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

L. Nicholas Strong, Chairman
Jessamine-South Elkhorn Water District
P.O. Box 721
Nicholasville, Kentucky 40340-0721

Hon. Bruce E. Smith
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Hon. Robert M. Watt, III
Hon. Monica H. Braun
Stoll Keenon Ogden, PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507

this ^{19th} day of September, 2014



Assistant Attorney General