## MATHIS, RIGGS & PRATHER, P.S.C.

ATTORNEYS AT LAW

500 MAIN STREET, SUITE 5 SHELBYVILLE, KENTUCKY 40065

C. LEWIS MATHIS, JR. T. SHERMAN RIGGS DONALD. T. PRATHER NATHAN T. RIGGS TELEPHONE: (502) 633-5220 FAX: (502) 633-0667

E-MAIL: mrp@iglou.com

March 13, 2006

RECEIVED

MAR 1 5 2006

PUBLIC SERVICE COMMISSION

Beth O'Donnell, Executive Director Public Service Commission 211 Sower Blvd P.O. Box 615 Frankfort, KY 40602

Re: Annette D. Calvert v. U.S. 60 Water District

Case No. 2005-00356

Dear Ms. O'Donnell:

Enclosed please find one original and ten (10) copies, plus an extra first page only, of the U.S. 60 Water District of Shelby and Franklin Counties, Kentucky List of Witnesses in regard to the captioned action. Please file the original and ten copies with the Commission and return to me the file-stamped first page copy. For your convenience I have enclosed a self-addressed stamped envelope.

Yours truly,

MATHIS, RIGGS & PRATHER, P.S.C.

Donald T. Prather

DTP/pm Enclosures

Cc: Darrell Dees, Manager Sandy Broughman, Engineer William Eggen, Chairman

Don/sec/stewart/PSC filing

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MAR 1 5 2006
PUBLIC SERVICE
COMMISSION

ANNETTE D. CALVERT	}
COMPLAINANT	} }
V.	CASE NO. 2005-00356
	} }
U.S. 60 WATER DISTRICT	} }
DEFENDANT	<i>}</i>

## U.S. 60 WATER DISTRICT OF SHELBY AND FRANKLIN COUNTIES, KENTUCKY LIST OF WITNESSES

Comes U.S. 60 Water District of Shelby and Franklin Counties, Kentucky (hereinafter the "District"), and complies with the Commission's Order dated February 10, 2006 by disclosing the following expected witnesses, together with a summary of the expected testimony of each:

1. Warner A. Broughman, III: Mr. Broughman is the engineer for the District. He is expected to testify regarding the projected route of the water main and easement across the Calvert property, and explain what trees, if any, would be damaged or removed under various possible routes for the water main. He is also expected to testify regarding his several trips to the Calvert property when he marked the proposed location of the line and/or spoke with Ms. Calvert and/or her son. Mr. Broughman is also expected to testify that Ms. Calvert's property is zoned Rural Residential ("RR") under the Franklin County Zoning Regulations. It has a minimum front building line setback of

35 feet from the property line at the right-of-way and a minimum rear building line setback of 40 feet. The requested easement will lie within the restricted setback zone.

2. **Darrell Dees or Gary Brown**: These are the Manager and Assistant Manager, respectively, of the District. One or the other, or both, of them would be available to testify regarding the location of the District's current water main on Bridgeport Road and the location of the Calvert water meter(s). They will also testify that, at Ms. Calvert's request, they installed a cutoff valve inside her meter jar and replaced a water meter cover as soon as these items were brought to the District's attention.

3. **Donald T. Prather**: Mr. Prather is the attorney for the District and will testify regarding his several telephone and written contacts with Ms. Calvert.

Respectfully Submitted,

MATHIS, RIGGS & PRATHER, P.S.C.

Donald T. Prather

500 Main Street, Suite 5

Shelbyville, Kentucky 40065

Phone (502) 633-5220

Fax (502) 633-0667

## CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing Answer was this 13 day of March, 2006 mailed to the following:

Annette D. Calvert 575 Old U.S. 60 Frankfort, KY 40601

Donald T. Prather