

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

CARROLL COUNTY WATER DISTRICT NO. 1)
COMPLAINANT)

V.)

GALLATIN COUNTY WATER DISTRICT)
DEFENDANT)

CASE NO. 2007-00202

Comes now the Defendant, Gallatin County Water District (hereinafter GCWD), and propounds the following Interrogatories, Requests for Admissions and Request for Production of Documents to Plaintiff, Carroll County Water District No. 1 (hereinafter CCWD) to be answered under oath and in accordance with orders of the Public Service Commission, to wit:

INTERROGATORIES

1. Identify the name(s), address(es) and telephone number(s) of each person providing information used to respond to this discovery request.

2. State the name, occupation, business address, business telephone number, residential address and residential telephone number of each person you expect to call as a witness at the PSC hearing or who has knowledge of facts and circumstances you rely upon as to any issue in this case, together with a summary of the matters to be testified about or within the knowledge of each such person.

3. Please identify by name and description each of the items, including, but not limited to, documents, photographs, videos, charts, maps, models, plats, drawings or diagrams which you intend to use and rely upon as an exhibit, or to which reference will be made, in the course of the PSC hearing of this matter.

4. State the name, business address and business telephone number of each engineer who provides technical assistance on CCWD projects, including all projects and on-going operations in Gallatin County.

8. In the event CCWD is unable to serve the area in controversy by way of purchasing water from GCWD at the end of its existing 8" line closest to the subject area, please describe;

(a) how CCWD would propose to provide water service and fire protection to the area in controversy,

(b) what additional equipment, apparatus, lines and upgrades would be necessary to provide such service,

(c) your best estimate of the cost of the above (a) and (b),

(d) the length of time necessary to accomplish the above, and

(e) the prospective source of funding of the above.

9. Please describe in detail CCWD's plan of how to provide water service and fire protection to the area in controversy.

10. Please identify what water lines of GCWD installed since 1997 involved work performed by Darrell Lykins in the installation process.

REQUEST FOR ADMISSIONS

1. Do you admit that your existing water line closest to the area in controversy is 4" in diameter?

2. As to each of the following subparts, do you admit that in or about November, 2006, at a meeting at the Gallatin County Free Public Library, Jim Smith stated, in the presence of Morris Courtney and others, words to the effect, that;
 - (a) CCWD cannot presently serve the subject area on its own, that is, without purchasing water from GCWD delivered through the latter's existing line,
 - (b) That in order for CCWD to otherwise serve the affected area additional line upgrades and extensions, and a water tank tower, would be required,
 - (c) That he, Smith, estimated the cost of the above to be \$400,000.00?

3. As to each of the properties listed below, do you admit that since circa March 1997 GCWD has provided water service to that property;
 - (a) Clarence Stewart farm
 - (b) Jeff Stewart farm
 - (c) Billy and Regina Stewart farm
 - (d) Old Wheeler farm (Clarence Stewart)?

4. As to each of the four properties listed in No. 3 above, do you admit that each lies within the service territory claimed by CCWD?

5. As to each of the four properties listed in No. 3 above, do you admit that GCWD commenced and has continued water service to those properties without objection from CCWD?

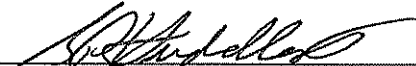
6. Do you admit that GCWD commenced the initial water service to Kentucky Speedway, and continues to provide it water service, with the consent of CCWD?

7. Do you admit that in or about 2002, Darrell Lykins worked on the installation of the GCWD water line which presently exists on lands claimed by CCWD to be within its service territory, said line being that of GCWD which terminates nearest the area in controversy, and runs from Kentucky Speedway, along Speedway Blvd., thence turning north at old Ky. 1130, and thence west through the Keeton farm to its termination point.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. All correspondence, documents, e-mail or other writings by and between the parties hereto concerning the extension of GCWD pipelines into any area within the service territory claimed by CCWD.
2. Any and all correspondence, documents, e-mail or other writings by and between CCWD and the owners, lessees or developers of the area in controversy (that is, the site proposed to be served at I-71 and Ky. Hwy. 1039), or their agents, contractors or employees.
3. A copy of any application of CCWD made with the Ky. Division of Water for the extension of its water service to the area in controversy, together with copies of the plans and specifications for the project.
4. A copy of all engineering plans, specifications or reports procured by CCWD for any planned extension of its service to the area in controversy, together with any approvals, rejections, modifications or evaluations of or to same issued by any state agency.

5. Any documents, writings, e-mail or other instrument's evidencing CCWD's present or past plans for financing the extension of its service to the area in controversy, regardless of whether same remain viable at present.



Stephen P. Huddleston
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Water District
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CERTIFICATION

This is to certify that the foregoing was served by mailing a true copy of same by first class mail, postage prepaid to Hon. Ruth H. Baxter, P.O. Box 353, Carrollton, Kentucky 41008, and Public Service Commission, P.O. Box 615, Frankfort, Kentucky 40602-0615, this the 7th day of September, 2007.