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July 19, 2018

Gwen R. Pinson, Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602-0615

RECEIVED

JUL 20 2018

PUBLIC SERVICE
COMMISSION

RE: Martin County Concerned Citizens Inc.'s
Fourth Request for Information
PSC Case No. 2016-142

Dear Ms. Pinson,

Please find enclosed the original and six copies of Martin County Concerned Citizens Inc.'s Fourth Request for Information from the Martin County Water District.

Copies are provided this day to counsel of record for the Martin County Water District via U.S. mail and electronic mail.

Sincerely,



Mary Varson Cromer

Enclosures

RECEIVED

JUL 20 2018

PUBLIC SERVICE
COMMISSION

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In The Matter Of:
INVESTIGATION OF THE
OPERATING CAPACITY OF
MARTIN COUNTY WATER
DISTRICT PURSUANT TO KRS
278.280

No.: 2016-000142

**MARTIN COUNTY CONCERNED CITIZENS, INC.'S FOURTH REQUEST
FOR INFORMATION FROM MARTIN COUNTY WATER DISTRICT**

Martin County Concerned Citizens, Inc. ("MCCC"), by and through counsel, submits these requests for information to the Martin County Water District ("Martin District") pursuant to 807 KAR 5:001 Sec. 4(12) and in conformance with this Commission's order of July 18, 2018.

As set forth in the Commission's April 11, 2016 Order initiating this investigation:

1. Responses to requests for information shall be appropriately bound, tabbed, and indexed and shall include the name of the witness responsible for responding to questions related to the information provided. Copies shall be sent to MCCC and the original and one copy shall be provided to the Commission.
2. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, shall be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response

is true and accurate to the best of the person's knowledge, information, and belief formed after reasonable inquiry.

3. The Martin District shall make timely amendment to any prior response if it obtains information that indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect.
4. For any request that the Martin District refuses to furnish all or part of the requested information, the Martin District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.
5. If the Martin District's response contains personal information, the Martin District shall, in accordance with 807 KAR 5:001 Sec. 4(10), encrypt or redact the response so that personal information cannot be read.

In addition, where the response to the requests consists of information or a statement that is already in the Commission's record or is otherwise publicly available, provide a detailed citation to the document or other resource that contains the information. Such citation shall include the title of the document and the relevant page number. If the document is publicly available online, provide the URL and a notation of when the URL was last accessed by the Martin District.


In the event any document sought by MCCC has been destroyed, specify the date and the manner of such destruction, the person directing or authorizing the destruction, and the custodian of the document at the time of its destruction.

DATA REQUESTS

1. Provide an update on the Martin District's efforts to hire a General Manager. Include in the update a copy of the advertisement for the position and a list of the locations in which the advertisement was posted. If a new General Manger has been hired, provide a copy of the new hire's resume and list the salary and benefits of the new hire.
2. Provide any information regarding the Martin District's plans, if any, to hire new employees this year. If the Martin District does plan to hire new employees, provide job description(s) and expected salary range(s) and benefits package(s) for any such new hire.
3. Provide a copy of all correspondence since May 31, 2018 regarding the Hollybush Extension Project between the Martin District and the Army Corps of Engineers, the Kentucky Engineering Group, the Martin County Fiscal Court, and the Martin County School Board.
4. Describe the Martin District's plans to upgrade the main line to which the Hollybush extension is being attached. State the funding for the planned upgrade and provide an estimate of when the Martin District believes the main line will be replaced.
5. Prior to replacement of the main line, explain how the Martin District intends to manage pumping to and from the new high school location so that the new project does not exacerbate the problems the Martin District already has with the Route 40 main line.
6. Provide a copy of all correspondence between the Big Sandy Area Development District and the Martin District since May 1, 2018 regarding the administration of the \$3.4 million AML grant.
7. State whether the Martin District believes it is bound to use Kentucky Engineering Group as its engineer for the \$3.4 million AML grant. If the Martin District has been advised that it must or it likely must use Kentucky Engineering Group as its engineer for that project, state the name and affiliation of the person who so advised.
8. Provide a copy of all correspondence between the Kentucky Rural Water Association and the Martin District since May 1, 2018 regarding the Martin District's water loss reports.
9. Provide a copy of all correspondence between the Martin District and the Prestonsburg City Utilities Commission ("PCUC") since May 31, 2018.
10. If any meeting has occurred between PCUC representatives and representatives of the Martin District since May 31, 2018, state when the meeting occurred, who attended the meeting, what was discussed, and the outcome of the discussion.
11. If a new master meter has been installed at the water treatment plant, list the date of installation and the final cost of the meter and installation. If it has not been installed, explain why installation has not been completed and when installation is expected.
12. Provide the amount of the Martin District's current accounts receivable after write offs. If any accounts receivable are more than two years old, please state so affirmatively.
13. Explain why the corrected water loss numbers for January 2018 are substantially below other recent monthly water loss numbers for the Martin District.
14. Explain whether the Martin District is currently using its meters to determine water loss.
15. List all engineering design projects that have been completed on the raw water intake since 2003. For each project, briefly describe the project and list the date of the project, the engineering company in charge of the project, and the source of the

16. funding for the project.
Provide a list of all funding applications that are currently in process for the Martin District.

Respectfully Submitted,


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Counsel for MCCC

CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001 Sec. 6, I, Mary Varson Cromer, hereby certify that on July 20, 2018, a true and accurate copy of the foregoing Fourth Request for Information was served via electronic mail and postage-paid U.S. mail to the following:

Brian Cumbo
86 W. Main St., STE 100
P.O. Box 1844
Inez, KY 41224
cumbolaw@cumbolaw.com
Counsel for Martin County Water District


Counsel for the MCCC