

# Rubin & Hays

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August 1, 2016

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PUBLIC SERVICE  
COMMISSION

Ms. Talina R. Mathews  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, Kentucky 40602

**Re: Mountain Water District - Case No. 2016-00266**

Dear Ms. Mathews:

Enclosed please find the original and ten (10) copies of the Mountain Water District's Response to Attorney General's Initial Data Request.

**Also enclosed are the original and ten (10) copies of a Motion to Expedite pursuant to 807 KAR 5:001, Section 5.**

If you need any additional information or documentation, please let us know.

Sincerely,

Rubin & Hays

By   
W. Randall Jones

WRJ:jlm  
Enclosures

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

In the matter of:

<b>THE APPLICATION OF THE MOUNTAIN</b>	)	
<b>WATER DISTRICT FOR A CERTIFICATE</b>	)	
<b>OF PUBLIC CONVENIENCE AND NECESSITY</b>	)	<b>Case No. 2016-00266</b>
<b>TO CONSTRUCT AND FINANCE PURSUANT</b>	)	
<b>TO KRS 278.023</b>	)	

**Motion to Expedite**

The Mountain Water District (the "District"), by counsel, pursuant to 807 KAR 5:001, Section 5, hereby files its Motion to Expedite the issuance of the requested Certificate of Public Convenience and Necessity ("CPC&N") . In support of this Motion, the District hereby states as follows:

The project that is the subject of the CPC&N request in this Case is the Upper Pompey Water Supply Project (the "Project") This Project will provide potable water to approximately 30 families who are currently without such water. These families were relying on wells to provide water and their well water has been contaminated with high levels of iron and sulfur. Some of the families have reported that their wells have gone dry.


The families that will be served by this Project currently receive deliveries of bottled water from a local coal company. This is their only source of potable water.

The District received bids on this Project on April 26, 2016. The contractor who was awarded the bid is ready to proceed as soon as a CPC&N is issued. The construction time period is six months and the District would very much like to have the Project completed prior to winter weather which may cause further delays.

For the above reasons, the District respectfully requests that the Commission move this case to the head of its docket and issue the CPC&N as soon as possible

Respectfully Submitted:

Rubin & Hays


By   
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**Certificate of Service and Filing**

The undersigned Counsel to the Mountain Water District, in Case No. 2016-00266, hereby certifies (i) that an original and ten copies of the foregoing were served and filed, via hand delivery, to Ms. Talina Mathews, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; and (ii) that true and accurate copies of the foregoing were mailed via the United States Postal Service, first class, postage prepaid to:

Honorable Andy Beshear  
Kentucky Attorney General  
1024 Capital Center Drive  
Suite 200  
Frankfort, Kentucky 40601-8204

On this August 1, 2016.

  
W. Randall Jones, Esq.  
Rubin & Hays