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January 18, 2022

Ms. Linda C. Bridwell, P.E. Executive Director Kentucky Public Service Commission P.O. Box 615 Frankfort, KY 40602-0615 RECEIVED JAN 18 2022

PUBLIC SERVICE COMMISSION

Re: Case No. 2019-00375

Green River Valley Water District

Dear Ms. Bridwell:

Enclosed for filing in the above-referenced matter is Green River Valley Water District's Motion to Dismiss.

Sincerely,

Stoll Keenon Ogden PLLC

Gerald E. Wuetcher

GEW Enclosure

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| TRACY KAY SANDERS |) |
|-----------------------------------|-----------------------|
| COMPLAINANT |)) |
| v. |) CASE NO. 2019-00375 |
| GREEN RIVER VALLEY WATER DISTRICT |) |
| DEFENDANT |) |

MOTION TO DISMISS

Pursuant to 807 KAR 5:001, Section 20(5), Green River Valley Water District ("Green River District") moves for dismissal of the Complaint in this matter. Based upon the information set forth in its responses to Commission Staff's Requests for Information and its Status Reports to the Commission, Green River District has demonstrated that it has satisfied the Complaint, has installed the necessary infrastructure to provide water service to the Complainant at a pressure consistent with the requirements of 807 KAR 5:066, Section 5, and has been providing such service since December 15, 2021.

WHEREFORE, Green River District requests that the Commission dismiss the Complaint and remove this case from its docket.

Dated: January 18, 2022

Respectfully submitted,

Patrick A. Ross hrh@scrtc.com

Hensley & Ross Attorneys

P.O. Box 350

Horse Cave, Kentucky 42749 Telephone: (270) 786-2155

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Telephone: (859) 231-3017

Fax: (859) 259-3517

Counsel for Green River Valley Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 6, I certify that a true and accurate copy of this Motion was served by U.S. Mail, postage prepaid, on Tracy Kay Sanders, 1134 Bunnell Crossing Road, Munfordville, Kentucky 42765 on January 18, 2022. I further certify that an electronic copy of this Motion was transmitted to the Public Service Commission on January 18, 2022 by electronic mail to psced@ky.gov.

Counsel for Green River Valley Water District

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

| In | the | Matter | of: |
|----|-----|--------|-----|
| | | | |

| TRACY KAY SANDERS |) |
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| COMPLAINANT |) |
| v. |) CASE NO. 2019-00375 |
| GREEN RIVER VALLEY WATER DISTRICT |) |
| DEFENDANT |) |

RESPONSE OF GREEN RIVER VALLEY WATER DISTRICT TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION

Green River Valley Water District submits its Response to Commission Staff's Second Request for Information.

Dated: January 18, 2022 Respectfully submitted,

Patrick A. Ross hrh@scrtc.com

Hensley & Ross Attorneys

P.O. Box 350

Horse Cave, Kentucky 42749 Telephone: (270) 786-2155

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Gerald E. Wuetcher gerald.wuetcher@skofirm.com Stoll Keenon Ogden PLLC 300 West Vine St. Suite 2100 Lexington, Kentucky 40507-1801

Telephone: (859) 231-3000

Fax: (859) 259-3517

Counsel for Green River Valley Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 6, I certify that a true and accurate copy of this Response was served by U.S. Mail, postage prepaid, on Tracy Kay Sanders, 1134 Bunnell Crossing Road, Munfordville, Kentucky 42765 on January 19, 2022. I further certify that an electronic copy of this Response was transmitted to the Public Service Commission on January 19, 2022 by electronic mail to psced@ky.gov.

Counsel for Green River Valley Water District

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

| In the Matter of: | |
|-----------------------------------|-----------------------|
| TRACY KAY SANDERS |) |
| COMPLAINANT |) |
| v. |) CASE NO. 2019-00375 |
| GREEN RIVER VALLEY WATER DISTRICT |) |
| DEFENDANT |) |

RESPONSE OF

GREEN RIVER VALLEY WATER DISTRICT

TO

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION

FILED: January 18, 2022

VERIFICATION

| COMMONWEALTH OF KENTUCKY |) | |
|---|--|--|
| COUNTY OF HART |) SS:) | |
| The undersigned, David Paige, being duly sworn, deposes and states that he is the General Manager of Green River Valley Water District and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief. | | |
| | David Paige General Manager Green River Valley Water District | |
| Subscribed and sworn to before me, this _/\frac{1}{2} day of January 2022. | a Notary Public in and before said County and State, Notary Public Notary Public | |
| | My Commission Expires: 12-9-2023 | |
| | Notary ID: 436 733 | |

Response to Commission Staff's Second Request for Information Case No. 2019-00375

Question No. 1

Responding Witness: David Paige

- Q-1. Refer to Green River Valley District's Status Report filed on December 7, 2021.
 - a. Provide the date the booster station went into service.
 - b. If the booster station has not gone into service, explain why and provide a date by which the booster station is expected to go into service.
 - c. Provide the pound per square inch of water pressure for 1134 Bunnell Crossing Road, Munfordville, Kentucky, since the booster station went into service.
- A-1. a. The booster station was placed into service on December 15, 2021.
 - b. Not applicable.
 - c. 55 pounds per square inch.

Response to Commission Staff's Second Request for Information Case No. 2019-00375

Question No. 2

Witness: David Paige

- Q-2. Provide a statement concerning the low-pressure condition at 1134 Bunnell Crossing Road, Munfordville, Kentucky. Include in the response any documentation of low pressure at 1134 Bunnell Crossing Road, Munfordville, Kentucky, since the completion of the booster station.
- A-2. The low-pressure condition has been resolved. The water pressure at the metering point for 1134 Bunnell Crossing Road, Munfordville, Kentucky since the completion of the pumping station has been approximately 55 pounds per square inch.

Response to Commission Staff's Second Request for Information Case No. 2019-00375

Question No. 3

Witness: David Paige

- Q-3. Provide a list, by address, of all low-pressure conditions in the Bunnell Crossing Road area of Munfordville, Kentucky, that have been resolved following the startup of the booster station.
- A-3. All low-pressure conditions that previously existed in the Bunnell Crossing Road area of Munfordville, Kentucky have been resolved. All addresses listed in the attachment to Commission Staff's Second Request for Information are now receiving water service at their metering points in excess of the minimum pressure requirements established in 807 KAR 5:066, Section 5.

Response to Commission Staff's Second Request for Information Case No. 2019-00375

Question No. 4

Witness: David Paige

- Q-4. Provide a list, by address, of any low-pressure conditions known by Green River Valley District to remain in the Bunnell Crossing Road area of Munfordville, Kentucky, following the startup of the booster station.
- A-4. Green River Valley Water District has no knowledge of any low-pressure conditions in the Bunnell Crossing Road area of Munfordville, Kentucky since the booster station was placed into service on December 15, 2021.