

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC CUMBERLAND COUNTY WATER	)	
DISTRICT, ITS MANAGER, MATTHEW DYER,	)	
AND ITS INDIVIDUAL COMMISSIONERS, TROY	)	CASE NO.
NORRIS, ERIC CARVER, SANDY HEINEMAN,	)	2023-00233
JAY CARY, AND MARK VIBBERT ALLEGED	)	
FAILURE TO COMPLY WITH KRS 278.300	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO CUMBERLAND COUNTY WATER DISTRICT

Cumberland County Water District (Cumberland District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 22, 2023. The Commission directs Cumberland District to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. 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, 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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

Cumberland District shall make timely amendment to any prior response if Cumberland District obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Cumberland District fails or refuses to furnish all or part of the requested information, Cumberland District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Cumberland District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Cumberland District's response to Commission's Order sworn by Sandy Heineman. Confirm that Ms. Heineman resigned on July 10, 2023. If not confirmed, explain the discrepancy between the Cumberland District's Board meeting minutes from July 10, 2023 provided in Case No. 2023-00234<sup>2</sup> and the response.

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<sup>2</sup> Case No.2023-00234 *Electronic Investigation Into Possible Vacancies on the Board of Commissioners of Cumberland County Water District* (Ky. PSC Aug. 8, 2023).

2. Provide any written policies or procedures adopted by Cumberland District's Board of Commissioners to prevent such possible violations of KRS 278.300 in the future.
3. Provide the current amount due and owing, the current interest rate, and the current fair market value of the Ditch Witch.
4. Provide the intentions of Cumberland District with regard to the Ditch Witch at the termination of the lease period.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED NOV 01 2023

cc: Parties of Record

\*Cumberland County Water District  
133 Lower River Street  
Burkesville, KY 42717-9622

\*Matthew Dyer  
Cumberland County Water District  
133 Lower River Street  
Burkesville, KY 42717-9622

\*Jay Cary  
Cumberland County Water District  
133 Lower River Street  
Burkesville, KY 42717-9622

\*Mark Vibbert  
Cumberland County Water District  
133 Lower River Street  
Burkesville, KY 42717-9622

\*Eric Carver  
Cumberland County Water District  
133 Lower River Street  
Burkesville, KY 42717-9622

\*Matthew Dyer  
Manager  
Cumberland County Water District  
133 Lower River Street  
Burkesville, KY 42717-9622

\*Sandy Heineman  
Cumberland County Water District  
133 Lower River Street  
Burkesville, KY 42717-9622

\*Troy Norris  
Cumberland County Water District  
133 Lower River Street  
Burkesville, KY 42717-9622