

DAMON R. TALLEY, P.S.C.

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DAMON R. TALLEY

ATTORNEY AT LAW

April 15, 2005

Ms. Beth O'Donnell
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

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PUBLIC SERVICE
COMMISSION

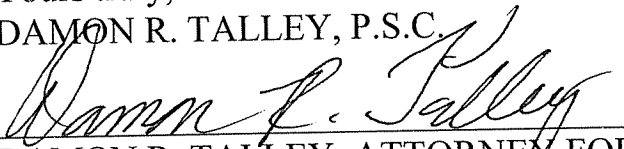
RE: Adams & Vaughn Complaint
Case No. 2005-00008
Garrard County Water Association, Inc.

Dear Ms. O'Donnell:

Enclosed for filing are the original and four (4) copies of the Witness List which is being filed on behalf of Garrard County Water Association, Inc.

Yours truly,

DAMON R. TALLEY, P.S.C.


DAMON R. TALLEY, ATTORNEY FOR
GARRARD COUNTY WATER
ASSOCIATION, INC.

DRT:ms

Enclosures

cc: Garrard County Water Association, Inc.
Danny Ray Adams
Calvin Vaughn

1. Harold C. "Coby" Ward, who is the President and Executive Director of Garrard Water, will testify concerning the following subject matters:

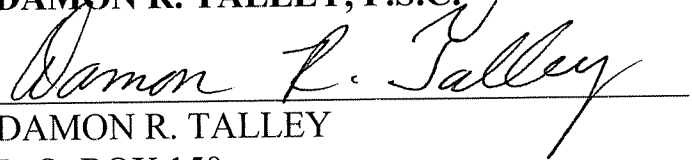
- A. Rules and Regulations (Tariff) of Garrard Water;
- B. Explanation of those provisions of Garrard Water's tariff relevant to this case;
- C. Discussion of reasons for adopting tariff provisions or policy which requires a prospective customer to own land adjacent to the water line or the road where the water distribution line is located before that person can be eligible to receive water service from Garrard Water;
- D. Discussion of problems experienced by Garrard Water under its prior policy;
- E. Explanation of available options for Mr. Adams to obtain water service from Garrard Water;
- F. Summary of meetings and discussions with Mr. Adams and efforts taken to assist Mr. Adams in this matter;
- G. Explanation of location of water distribution line and property lines of various persons in the vicinity of Mr. Adams' property;
- H. Discussion of cost estimate for installing a water distribution line extension to Mr. Adams' property;
- I. Explanation of circumstances relevant to Easement dated April 28, 1992 from Mr. Adams to Garrard Water and reasons why water meter was installed for the person owning land behind Mr. Adams' land (this is not the same Adams' land that is involved in the current controversy);
- J. Any and all matters contained in the Data Request submitted by the Commission Staff; and
- K. Any testimony necessary for rebuttal purposes.

2. Mr. Donald P. Rinthen, Jr., 1497 Kirksville Road, Lancaster, Kentucky 40444. Mr. Rinthen owns property adjacent to Mr. Adams and will testify concerning the following subject matters:

- A. Location of relevant property boundary lines;
- B. Mr. Adams had knowledge before he purchased the subject parcel of real estate that the land did not abut a water line and could not be served by Garrard Water under Garrard Water's tariff. Despite this advance knowledge, Mr. Adams proceeded to purchase the subject real estate;
- C. The dispute between Mr. Adams and Mr. Rinthen concerning the driveway that Mr. Adams constructed across Mr. Rinthen's land without Mr. Rinthen's permission. This driveway extends from Vaughn Way (a private road) to Mr. Adams' land; and
- D. Any testimony necessary for rebuttal purposes.

Respectfully Submitted,

DAMON R. TALLEY, P.S.C.



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ATTORNEY FOR GARRARD COUNTY

WATER ASSOCIATION, INC.

CERTIFICATE OF SERVICE

This is to certify that I have mailed a true copy of the foregoing pleading this 15th day of April, 2005, to the following:

Danny Ray Adams
1455 Perry Rogers Road
Lancaster, KY 40444

Calvin Vaughn
142 Vaughn Way
Lancaster, KY 40444

Harold C. Ward
Garrard County Water Association, Inc.
P. O. Box 670
Lancaster, KY 40444-0670



DAMON R. TALLEY