

S/A

CRAWFORD & BAXTER, P.S.C.

ATTORNEYS AT LAW

523 Highland Avenue
P.O. Box 353
Carrollton, Kentucky 41008

James M. Crawford
Ruth H. Baxter

Nicholas A. Marsh

Phone: (502) 732-6688
1-800-442-8680
Fax: (502) 732-6920
Email: CBJ523@AOL.COM

August 27, 2007

Commonwealth of Kentucky
Public Service Commission
ATTN: Filings
P.O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED
AUG 30 2007
PUBLIC SERVICE
COMMISSION

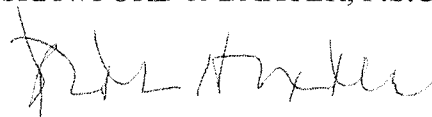
RE: Carroll County Water District No. 1 vs. Gallatin County Water District
Case No. 2007-00202

Dear Sir or Madam:

Please find enclosed ten (10) copies of the Interrogatories and Requests for Production of Documents with regard to the above styled case. If you have any questions or concerns with regard to the enclosed, please feel free to contact my office at (502) 732-6688.

Sincerely,

CRAWFORD & BAXTER, P.S.C.



Ruth H. Baxter

RHB/dmp

Enclosures

cc: Mr. James L. Smith, Manager, CCWD

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 30 2007

PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

CARROLL COUNTY WATER DISTRICT NO. 1)

COMPLAINANT)

VS.)

CASE NO. 2007-00202

GALLATIN COUNTY WATER DISTRICT)

DEFENDANT)

**COMPLAINANT CARROLL COUNTY WATER DISTRICT NO. 1'S
INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED TO
DEFENDANT GALLATIN COUNTY WATER DISTRICT**

** ** * * * **

Comes now Complainant Carroll County Water District No. 1 (CCWD), and propounds the following Interrogatories and Requests for Production of Documents to the Defendant Gallatin County Water District (GCWD):

INTERROGATORIES

1. Identify the name(s), address(es), and telephone number(s) of all person(s) providing information for answers to these Interrogatories.

ANSWER:

2. State in full and complete detail a full description of the proposed location; route or routes of the new construction and/or extension, including a description of the manner in

CRAWFORD & BAXTER, P.S.C.
ATTORNEYS-AT-LAW
CARROLLTON, KY

which same will be constructed for the proposed extension at Interstate 71, Exit 55, the manner in detail in which GCWD proposes to finance the new construction and/or extension, and an estimated cost of operation after the proposed facilities are completed.

ANSWER:

3. State each date(s) when the GCWD first extended its pipeline into any portion of territorial boundar(ies) of the CCWD, and for each such date, state: a.) the purpose of the extension; b.) the name and address of the contractor responsible for the construction work; c.) the cost of the extension of the pipeline; and d.) the source of the payment for the extension of the pipeline.

ANSWER:

4. State the name, occupation, business address, business telephone number, residence address, and residence telephone number of each person you expect to call as a witness at the PSC hearing or who had knowledge of facts and circumstances you rely upon as to any issue in this case, together with a summary of the matters to be testified about or within the knowledge of each such person.

ANSWER:

5. Please identify by name and description each of the items, including but not limited to, documents, photographs, videos, charts, maps, models, plats, drawings or diagrams,

which you intend to use and rely upon as an exhibit, or to which reference will be made, in the course of the PSC hearing of this matter.

ANSWER:

6. State the name, occupation, business address, business telephone number, residence address, and residence telephone number of each person you expect to call as an expert witness at the PSC hearing, the subject matter on which the expert is expected to testify, and the substance of the expert's testimony.

ANSWER:

7. State the name, business address and business telephone number of each engineer who provides technical assistance on GCWD projects, including the Interstate 71, Exit 55, project extension which is the subject of the PSC hearing.

ANSWER:

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. For each date identified in Answer to Interrogatory No. 3, provide: a.) the resolution from the Commissioners of the GCWD authorizing the extension of the pipeline; b.) the request(s) for service necessitating the extension of the pipeline; c.) the advertisement(s) for bids for

the extension of the pipeline; d.) the bid(s) or estimates obtained from contractors for the extension of the pipeline; and e.) the contract(s) with the contractor(s) hired to extend the pipeline.

RESPONSE:

2. For each date identified in Answer to Interrogatory No. 3, provide a true and correct copy of the application of GCWD to the Kentucky Public Service Commission for a certificate of convenience and necessity.

RESPONSE:

3. For each date identified in Answer to Interrogatory No. 3, provide a true and correct copy of the plans and specifications submitted to the Kentucky Division of Water and the permit and/or authorization issued by the Kentucky Division of Water for such extension.

RESPONSE:

4. All correspondence, documents, email, or other written communications by and between the Carroll County Water District No. 1 and the Gallatin County Water District concerning the extension of GCWD pipelines into territory within the territorial boundaries of the CCWD.

RESPONSE:

5. Please produce a copy of the application GCWD made with the Kentucky Division of Water for the extension which is the subject of this controversy, together with copies of the plans and specifications for the extension.

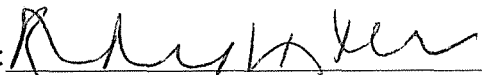
RESPONSE:

6. Please produce a copy of the application of proposed user at the site at Interstate 71, Exit 55, for services of Gallatin County Water District, together with all supporting documentation which establishes the service being requested, the amount of water to be used, and the water pressure being required.

RESPONSE:

CRAWFORD & BAXTER, P.S.C.
ATTORNEYS AT LAW
523 Highland Avenue
P.O. Box 353
Carrollton, Kentucky 41008
Phone: (502) 732-6688
Facsimile: (502) 732-6920
E-mail Address: CBJ523@aol.com

Attorneys for Complainant
Carroll County Water District No. 1

By: 
Ruth H. Baxter

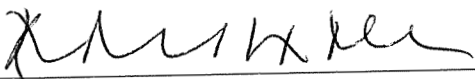
CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Interrogatories and Requests for Production of Documents was mailed postage prepaid, on this the 27 day of August, 2007, to:

Hon. Stephen P. Huddleston
P.O. Box 807
Warsaw, Kentucky 41095
Attorney for Defendant
Gallatin County Water District

and the original to:

Commonwealth of Kentucky
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

By: 

Ruth H. Baxter
Attorney for Complainant
Carroll County Water District #1

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 30 2007

PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

CARROLL COUNTY WATER DISTRICT NO. 1)

COMPLAINANT)

VS.)

CASE NO. 2007-00202

GALLATIN COUNTY WATER DISTRICT)

DEFENDANT)

**COMPLAINANT CARROLL COUNTY WATER DISTRICT NO. 1'S
INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED TO
DEFENDANT GALLATIN COUNTY WATER DISTRICT**

** ** * * *

Comes now Complainant Carroll County Water District No. 1 (CCWD), and propounds the following Interrogatories and Requests for Production of Documents to the Defendant Gallatin County Water District (GCWD):

INTERROGATORIES

1. Identify the name(s), address(es), and telephone number(s) of all person(s) providing information for answers to these Interrogatories.

ANSWER:

2. State in full and complete detail a full description of the proposed location: route or routes of the new construction and/or extension, including a description of the manner in

CRAWFORD & BAXTER, P.S.C.
ATTORNEYS-AT-LAW
CARROLLTON, KY

which same will be constructed for the proposed extension at Interstate 71, Exit 55. the manner in detail in which GCWD proposes to finance the new construction and/or extension, and an estimated cost of operation after the proposed facilities are completed.

ANSWER:

3. State each date(s) when the GCWD first extended its pipeline into any portion of territorial boundar(ies) of the CCWD, and for each such date, state: a.) the purpose of the extension; b.) the name and address of the contractor responsible for the construction work; c.) the cost of the extension of the pipeline; and d.) the source of the payment for the extension of the pipeline.

ANSWER:

4. State the name, occupation, business address, business telephone number, residence address, and residence telephone number of each person you expect to call as a witness at the PSC hearing or who had knowledge of facts and circumstances you rely upon as to any issue in this case, together with a summary of the matters to be testified about or within the knowledge of each such person.

ANSWER:

5. Please identify by name and description each of the items, including but not limited to, documents, photographs, videos, charts, maps, models, plats, drawings or diagrams.

which you intend to use and rely upon as an exhibit, or to which reference will be made, in the course of the PSC hearing of this matter.

ANSWER:

6. State the name, occupation, business address, business telephone number, residence address, and residence telephone number of each person you expect to call as an expert witness at the PSC hearing, the subject matter on which the expert is expected to testify, and the substance of the expert's testimony.

ANSWER:

7. State the name, business address and business telephone number of each engineer who provides technical assistance on GCWD projects, including the Interstate 71, Exit 55, project extension which is the subject of the PSC hearing.

ANSWER:

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. For each date identified in Answer to Interrogatory No. 3, provide: a.) the resolution from the Commissioners of the GCWD authorizing the extension of the pipeline; b.) the request(s) for service necessitating the extension of the pipeline; c.) the advertisement(s) for bids for

the extension of the pipeline; d.) the bid(s) or estimates obtained from contractors for the extension of the pipeline; and e.) the contract(s) with the contractor(s) hired to extend the pipeline.

RESPONSE:

2. For each date identified in Answer to Interrogatory No. 3, provide a true and correct copy of the application of GCWD to the Kentucky Public Service Commission for a certificate of convenience and necessity.

RESPONSE:

3. For each date identified in Answer to Interrogatory No. 3, provide a true and correct copy of the plans and specifications submitted to the Kentucky Division of Water and the permit and/or authorization issued by the Kentucky Division of Water for such extension.

RESPONSE:

4. All correspondence, documents, email, or other written communications by and between the Carroll County Water District No. 1 and the Gallatin County Water District concerning the extension of GCWD pipelines into territory within the territorial boundaries of the CCWD.

RESPONSE:

5. Please produce a copy of the application GCWD made with the Kentucky Division of Water for the extension which is the subject of this controversy, together with copies of the plans and specifications for the extension.

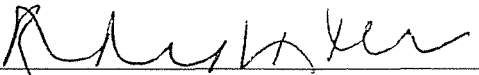
RESPONSE:

6. Please produce a copy of the application of proposed user at the site at Interstate 71, Exit 55, for services of Gallatin County Water District, together with all supporting documentation which establishes the service being requested, the amount of water to be used, and the water pressure being required.

RESPONSE:

CRAWFORD & BAXTER, P.S.C.
ATTORNEYS AT LAW
523 Highland Avenue
P.O. Box 353
Carrollton, Kentucky 41008
Phone: (502) 732-6688
Facsimile: (502) 732-6920
E-mail Address: CBJ523@aol.com

Attorneys for Complainant
Carroll County Water District No. 1

By: 
Ruth H. Baxter

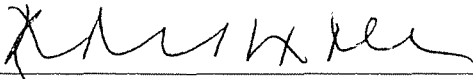
CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Interrogatories and Requests for Production of Documents was mailed postage prepaid, on this the 27 day of August, 2007, to:

Hon. Stephen P. Huddleston
P.O. Box 807
Warsaw, Kentucky 41095
Attorney for Defendant
Gallatin County Water District

and the original to:

Commonwealth of Kentucky
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

By: 

Ruth H. Baxter
Attorney for Complainant
Carroll County Water District #1