HAZELRIGG & COX, LLP

ATTORNEYS AT LAW
415 WEST MAIN STREET, SUITE 1
P.O. BOX 676
FRANKFORT, KENTUCKY 40602-0676

John B. Baughman Robert C. Moore Thomas J. Hellmann DYKE L. HAZELRIGG (1881-1970) LOUIS COX (1907-1971)

> Fax: (502) 875-7158 Telephone: (502) 227-2271

May 4, 2012

Mr. Jeff R. Derouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard P. O. Box 615 Frankfort, Kentucky 40602-0615 RECEIVED

MAY 07 2012

PUBLIC SERVICE COMMISSION

Re: Forest Creek vs. Jessamine - South Elkhorn Water District, Public Service Commission Case No. 2011-00297

Dear Executive Director Derouen:

Please find enclosed for filing in the above-referenced case the original and ten (10) copies of Supplemental Information Requests served by Forest Creek, LLC upon Jessamine-South Elkhorn Water District. Please contact me if you would like to discuss this matter, or need any further information concerning same.

Robert C. Moore

RCM/neb

cc: Jerry Wuetcher - via electronic mail

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:	\
FOREST CREEK, LLC)
COMPLAINANT) Case No. 2011-00297
VS.	RECEIVED
JESSAMINE- SOUTH ELKHORN WATER DISTRICT	MAY 0 .7 2012
DEFENDANT) PUBLIC SERVICE OMMISSION

SUPPLEMENTAL INFORMATION REQUESTS SERVED BY FOREST CREEK, LLC UPON JESSAMINE-SOUTH ELKHORN WATER DISTRICT

Comes Forest Creek, LLC ("Forest Creek"), by counsel, and for its Supplemental

Information Requests to Jessamine - South Elkhorn Water District ("Water District"), states as
follows:

Information Request No. 1: Please identify by name and address each entity or individual that has applied since 2005 to the Water District for a water line extension (a) where it has taken more than two years to obtain the Water District's approval of the location of the off site utilities and (b) where it has taken more than three years to obtain the Water District's approval of the location of the off site utilities.

Answer:

<u>Information Request No. 2:</u> Please identify by name and address each entity or individual that has applied since 2005 to the Water District for a water line extension (a) where it has taken more than two years to obtain the Water District's approval of the construction plans of the water lines and (b) where it has taken more than three years to obtain the Water District's

approval of the construction plans of the water lines.

Answer:

<u>Information Request No. 3:</u> Please identify by name and address each entity or individual that has been named as a defendant in a lawsuit filed by the Water District since 2000, while applying for or requesting water service from the Water District.

Answer:

<u>Information Request No. 4:</u> Please identify by name and address each entity or individual that has obtained since 2005 approval from the Water District to locate any of its water lines in right of way owned by the Commonwealth of Kentucky or Jessamine County.

Answer:

Information Request No. 5: Please identify by name and address each entity or individual that has applied since 2005 to the Water District for a water line extension where John G. Horne, L. Christopher Horne or Horne Engineering, Inc., has served as the consultant or engineer for the applicant.

Answer:

Information Request No. 6: Please provide a copy of the minutes reflecting the approval of the Interim Water Service Agreement between Forest Creek and the Water District, and authorization for the Chairman of the Water District to sign the Interim Water Service Agreement.

Answer:

<u>Information Request No. 7:</u> Please identify by name and address each individual that will be called by the Water District to testify as a witness at the hearing scheduled in this case.

Answer:

<u>Information Request No. 8:</u> Please identify each document that will be introduced as an exhibit by the Water District at the hearing scheduled in this case.

Answer:

<u>Information Request No. 9:</u> Please provide copies of any documents or correspondence issued to J.R. Banks and/or Eagle Engineering denying an application for a water line extension.

Respectfully submitted,

Robert C. Moore

Hazelrigg & Cox, LLP

415 West Main Street, 1st Floor

P. O. Box 676

Frankfort, KY 40602-0676

Counsel for Forest Creek, LLP

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served by first class mail, postage prepaid, this the 4th day of May, 2012, to, Hon. Bruce E. Smith, **BRUCE E. SMITH LAW OFFICES**, **PLLC**, 201 South Main Street, Nicholasville, Kentucky 40356.

Robert C. Moore