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FEB 04 2015

PUBLIC SERVICE  
COMMISSION

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February 3, 2015

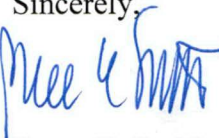
**VIA UPS OVERNIGHT**

Mr. Jeff R. Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

Re: Case No. 2014-00084  
Jessamine-South Elkhorn Water District CPCN Application

Dear Mr. Derouen:

Delivered under cover of this letter is an original and ten (10) copies of the Applicant's Motion to Incorporate Documents.

Sincerely,  
  
Bruce E. Smith

Enclosures

cc: Robert M. Watt, III, Esq.  
Monica H. Braun, Esq.  
Jennifer Black Hans, Esq.  
Gregory T. Dutton, Esq.  
Stefanie Kingsley, Esq.  
Ann Ramser, Esq.  
Anthony G. Martin, Esq.

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FEB 04 2015

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF JESSAMINE-SOUTH ELKHORN	)	
WATER DISTRICT FOR A CERTIFICATE OF	)	
PUBLIC CONVENIENCE AND NECESSITY TO	)	
CONSTRUCT AND FINANCE A WATERWORKS	)	CASE NO 2014 -00084
IMPROVEMENT PROJECT PURSUANT TO KRS	)	
278.020 AND 278.300	)	

APPLICANT’S MOTION TO INCORPORATE DOCUMENTS

Comes now the Applicant, Jessamine-South Elkhorn Water District (“the District” or “JSEWD”), by counsel, and moves pursuant to 807 KAR 5:001, Section 11(5) that certain documents in the Commission’s files be incorporated by reference into the record of this case.

The documents to be incorporated by reference are the Application of Kentucky American Water Company (“KAW”) for a Certificate of Public Convenience and Necessity and designated as PSC Case No. 2005-00546, and an attached Storage Capacity Analysis presented by KAW and dated December 21, 2005. The District also moves that a previous Storage Capacity Analysis prepared by KAW and dated November 15, 2002, be incorporated by reference as well. This analysis was referred to by the PSC in its Order of April 21, 2005, footnote 8, in Case No. 2005-00039, another CPCN application filed by KAW. It was filed of record in both Cases Nos. 2003-00478 and 2004-00254.

The items to be incorporated by reference were referred to in the District’s Application,

and requested therein to be incorporated by reference into the record of this proceeding. The references are found in Exhibit "A", page 3 footnote No. 5 and subsequent references, and in a document entitled "Exhibit A" Addendum at page 1. Upon the advice of PSC staff counsel, the District is formally moving herein to incorporate these documents.

The record in this case also includes a letter sent directly from the President of KAW, Cheryl Norton, advising that KAW would not be able to supply JSEWD's emergency storage needs. This letter was received by the PSC on March 20, 2014, and has been included in the online record of this proceeding. Further, the letter from City of Nicholasville Public Utilities Director, Tom Calkins, dated October 2, 2014, has been submitted in response to Intervenor's Requests for Information, No. 20. While the District thus believes that these letters are of record in this proceeding and may be referred to by the District, if it is necessary for these letters to be formally incorporated into the record, the District so moves.

Wherefore, the Applicant District moves that the above documents be incorporated by reference into this proceeding.

Anthony G. Martin, Esq.  
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**AND**



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**CO-COUNSEL FOR DISTRICT**

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing Applicant's Motion to incorporate Documents was emailed and mailed to the following individuals, postage prepaid, on February 3, 2014.

Robert M. Watt, III, Esq.  
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\_\_\_\_\_  
Bruce E. Smith