

APPALACHIAN CITIZENS' LAW CENTER, INC.

RECEIVED

317 MAIN STREET
WHITESBURG, KENTUCKY 41858
606-633-3929 1-877-637-3929
FAX 606-633-3925
www.appalachianlawcenter.org

MAY 25 2018

PUBLIC SERVICE
COMMISSION

STEPHEN A. SANDERS
Director
steve@appalachianlawcenter.org

WES ADDINGTON
Deputy Director
wes@appalachianlawcenter.org

MARY CROMER*
Staff Attorney
mary@appalachianlawcenter.org
*Also admitted in VA

EVAN B. SMITH
Staff Attorney
evan@appalachianlawcenter.org

May 22, 2018

Gwen R. Pinson, Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602-0615

RE: Martin County Concerned Citizens Inc.'s
Notice of Filing of Five Subpoenas
PSC Case No. 2016-142

Dear Ms. Pinson,

Please find enclosed and original and six copies of Martin County Concerned Citizens Inc.'s Motion for Issuance of Subpoenas in the above-referenced investigation.

Copies are provided this day to counsel of record for the Martin County Water District via U.S. mail and electronic mail.

Sincerely,

Mary Varson Cromer

Enclosures

RECEIVED

MAY 25 2018

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:
INVESTIGATION OF THE
OPERATING CAPACITY OF
MARTIN COUNTY WATER
DISTRICT PURSUANT TO KRS
278.280

No.: 2016-000162

MARTIN COUNTY CONCERNED CITIZENS, INC.'S NOTICE OF FILING

Martin County Concerned Citizens, Inc. ("MCCC"), by and through counsel,
hereby provides Notice of Filing of the five subpoenas attached hereto, which were
served on this day via U.S. registered mail.

Respectfully Submitted,

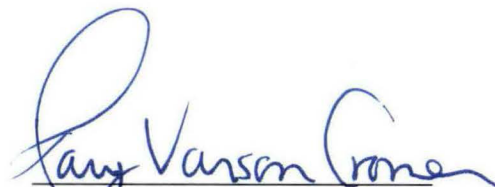


Mary Varson Cromer
Appalachian Citizens' Law Center, Inc.
317 Main Street
Whitesburg, Kentucky 41858
Telephone: 606-633-3929
Facsimile: 606-633-3925
mary@appalachianlawcenter.org
Counsel for MCCC
DATED: May 22, 2018

CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001 Sec. 6, I, Mary Varson Cromer, hereby certify that on April 25, 2018, a true and accurate copy of the foregoing Notice of Filing was served via electronic mail and postage-paid U.S. mail to the following:

Brian Cumbo
86 W. Main St., STE 100
P.O. Box 1844
Inez, KY 41224
cumbolaw@cumbolaw.com
Counsel for Martin County Water District



Counsel for the MCCC

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Investigation of the Operating Capacity of
Martin County Water District Pursuant to
KRS 278.280

)
) CASE NO. 2016-00142
)

SUBPOENA

1. The Public Service Commission TO: Linda Sumpter, C.P.A.


2. You are commanded to appear before the Public Service Commission, 211
Sower Boulevard, Frankfort, Kentucky 40602.

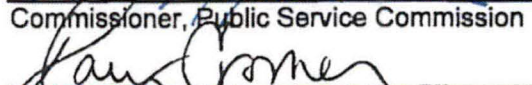
3. At 9 A.M.

4. On the 31st day of May 2018.

5. To testify on behalf of Martin County Concerned Citizens

Date: May 16, 2018



Commissioner, Public Service Commission


Requesting Attorney

This subpoena was served by delivery of a true copy via U.S. Mail, registered mail to:

Linda Sumpter, C.P.A.
910 Blackberry Road
Inez, Kentucky 41224

This 22nd day of May 2018

By Mary Cromer

Title MCCC Atty

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Investigation of the Operating Capacity of
Martin County Water District Pursuant to
KRS 278.280

)
) CASE NO. 2016-00142
)

SUBPOENA

1. The Public Service Commission TO: John Mills, Operations Manager, Martin County
Water District

2. You are commanded to appear before the Public Service Commission, 211
Sower Boulevard, Frankfort, Kentucky 40602.

3. At 9 A.M.

4. On the 31st day of May 2018.

5. To testify on behalf of Martin County Concerned Citizens

Date: May 16, 2018

Michael Schmidt
Commissioner, Public Service Commission
Jay Cromer
Requesting Attorney

This subpoena was served by delivery of a true copy via U.S. Mail, registered mail to:

John Mills, Operations Manager
Martin County Water District
1014 Main Street
Inez, Kentucky 41224

This 22nd day of May 2018

By Jay Cromer

Title MCCC Attorney

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Investigation of the Operating Capacity of
Martin County Water District Pursuant to
KRS 278.280

)
) CASE NO. 2016-00142
)

SUBPOENA

1. The Public Service Commission TO: Kelly Callaham, Martin County Judge Executive


2. You are commanded to appear before the Public Service Commission, 211
Sower Boulevard, Frankfort, Kentucky 40602.

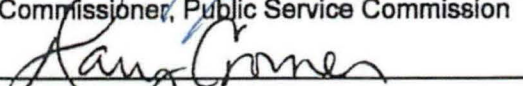
3. At 9 A.M.

4. On the 31st day of May 2018.

5. x To testify on behalf of Martin County Concerned Citizens

Date: May 16, 2018



Commissioner, Public Service Commission


Requesting Attorney

This subpoena was served by delivery of a true copy via U.S. Mail, registered mail to:

Kelly Callaham, Martin County Judge Executive
P.O. Box 309
Inez, Kentucky 41224

This 22nd day of May 2018

By Randy Cromer

Title MCCC Atty

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Investigation of the Operating Capacity of
Martin County Water District Pursuant to
KRS 278.280

)
) CASE NO. 2016-00142
)

SUBPOENA

1. The Public Service Commission TO: Bob Taylor, Client Manager and Project Manager
Kentucky Engineering Group


2. You are commanded to appear before the Public Service Commission, 211
Sower Boulevard, Frankfort, Kentucky 40602.

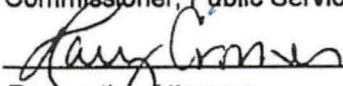
3. At 9 A.M.

4. On the 31st day of May 2018.

5. x To testify on behalf of Martin County Concerned Citizens

Date: May 16, 2018



Commissioner, Public Service Commission


Requesting Attorney

This subpoena was served by delivery of a true copy via U.S. Mail, registered mail to:

Bob Taylor, Client/Project Manager
Kentucky Engineering Group
P.O. Box 1034
161 North Locust Street
Versailles, Kentucky 40383

This 22nd day of May 2018

By Nancy Cronin

Title MCCC Athy

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Investigation of the Operating Capacity of
Martin County Water District Pursuant to
KRS 278.280

)
) CASE NO. 2016-00142
)

SUBPOENA

1. The Public Service Commission TO: Greg Scott, Interim General Manager, Martin
County Water District

2. You are commanded to appear before the Public Service Commission, 211
Sower Boulevard, Frankfort, Kentucky 40602.

3. At 9 A.M.

4. On the 31st day of May 2018.

5. x To testify on behalf of Martin County Concerned Citizens

Date: May 16, 2018

[Signature]
Commissioner, Public Service Commission
[Signature]
Requesting Attorney

This subpoena was served by delivery of a true copy via U.S. Mail, registered mail to:

Greg Scott, Interim General Manager, Martin County Water District,
1014 Main Street
Inez, Kentucky 41224

This 22nd day of May 2018

By [Signature]

Title MCCC Atty