

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JUN 06 2018

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

Case No.: 2016-001~~62~~¹⁴² -AH

PUBLIC SERVICE
COMMISSION

**MARTIN COUNTY CONCERNED CITIZENS, INC.'S POST-HEARING
REQUEST FOR INFORMATION FROM MARTIN COUNTY WATER
DISTRICT**

Martin County Concerned Citizens, Inc. ("MCCC"), by and through counsel, submits these post-hearing requests for information to the Martin County Water District ("MCWD") pursuant to 807 KAR 5:001 Sec. 4(12) and in conformance with this Commission's order of December 21, 2017.

As set forth in the Commission's April 11, 2016 Order initiating this investigation:

1. Responses to requests for information shall be appropriately bound, tabbed, and indexed and shall include the name of the witness responsible for responding to questions related to the information provided. Copies shall be sent to MCCC and the original and one copy shall be provided to the Commission.
2. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, shall be accompanied by a signed certification of the preparer or the person supervising the

preparation of the response on behalf of the entity that the response is true and accurate to the best of the person's knowledge, information, and belief formed after reasonable inquiry.

3. MCWD shall make timely amendment to any prior response if it obtains information that indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect.
4. For any request that MCWD refuses to furnish all or part of the requested information, MCWD shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.
5. If MCWD's response contains personal information, MCWD shall, in accordance with 807 KAR 5:001 Sec. 4(10), encrypt or redact the response so that personal information cannot be read.

In addition, where the response to the requests consists of information or a statement that is already in the Commission's record or is otherwise publicly available, provide a detailed citation to the document or other resource that contains the information. Such citation shall include the title of the document and the relevant page number. If the document is publicly available online, provide the URL and a notation of when the URL was last accessed by MCWD.

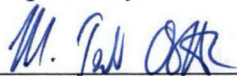
In the event any document sought by MCCC has been destroyed, specify the date and the manner of such destruction, the person directing or authorizing the destruction, and the custodian of the document at the time of its destruction.

DATA REQUESTS

1. Provide a copy of any correspondence from Department for Local Government (“DLG”) that indicates that the Martin District is or was non-compliant in failing to timely provide a 2018 budget.
2. Provide a copy of all correspondence sent by the Martin District in response to DLG’s notification and provide with such correspondence a copy of the 2018 budget sent to DLG.
3. Provide a copy of any letter or other correspondence sent by Greg Scott regarding the Hollybush water and sewer line extension project.
4. Provide a copy of documentation showing the Martin District’s net operating loss for 2017.
5. Provide a copy of all cash flow operating budgets for 2017 and 2018 and any adjustments to those budgets that have been made on a monthly basis.
6. Provide a copy of documentation showing the Martin District’s current cash balance.
7. Provide documentation of the number of meters pulled and the number of meters reinstalled since the Martin District began what Linda Sumpter referred to as “aggressive collections.”
8. Provide a copy of the Martin District’s most current Accounts Payable report.
9. Provide a copy of the Accounts Payable report as of April 1, 2018.
10. Provide documentation that shows the 17% decrease in expenses discussed by Jimmy Don Kerr and Linda Sumpter broken down by expense category.
11. List all items and real property that the Martin District rents and provide the

- monthly rental expense for each.
12. Describe the procedures used by the billing office to determine what debts are uncollectible. Provide a copy of any written procedures for determining uncollectible debts. If no written procedures exist, state so affirmatively.
 13. Provide a copy of any Memorandum of Agreement/Understanding entered by the Martin District regarding the recent ARC or AML grants.
 14. Provide a copy of the Martin District's most current Accounts Receivable report.

Respectfully Submitted,



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Counsel for MCCC

CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001 Sec. 6, I, M. Todd Osterloh, hereby certify that on June 6, 2018, a true and accurate copy of the foregoing Post-Hearing Data Requests was served via electronic mail and postage-paid U.S. mail to the following:

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Counsel for the MCCC