

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CUMBERLAND)	CASE NO.
FALLS HIGHWAY WATER DISTRICT FOR A)	2022-00365
DEVIATION)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO CUMBERLAND FALLS HIGHWAY WATER DISTRICT

Cumberland Falls Highway Water District (Cumberland Falls Highway District), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due no later than May 9, 2023. The Commission directs Cumberland Falls Highway District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. 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, 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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

Cumberland Falls Highway District shall make timely amendment to any prior response if Cumberland Falls Highway District obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Cumberland Falls Highway District fails or refuses to furnish all or part of the requested information, Cumberland Falls Highway District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Cumberland Falls Highway District shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the hearing testimony of Ken Taylor regarding his email correspondence with Mike Sparks. Provide the e-mails, including the dates sent, from Ken Taylor to Mike Sparks, in which the Contract for Extension of Water Main was referenced or attached.

2. Refer to the hearing testimony of Mike Sparks and Ken Taylor regarding Mr. Sparks's email correspondence with Ken Taylor. Provide the e-mails, including the dates sent, from Mike Sparks to Ken Taylor, in which the Contract for Extension of Water Main was referenced or attached.

3. Refer to the hearing testimony of Ken Taylor, Michael Baird, and Johnny Collette, generally, regarding Ken Taylor's business relationship with the Cumberland Falls Highway District. Provide an affidavit outlining Ken Taylor's relationship to Cumberland Falls Highway District, including his duties and responsibilities to Cumberland Falls Highway District. Include all instances in which Mr. Taylor is acting as a consultant, employee, contract employee, customer, advisor, agent for another party or any other capacity. In addition, if an employment contract exists, provide a copy of the executed contract.

4. Refer to the hearing testimony of Ken Taylor regarding his relationship with Cumberland Falls Highway District. Provide a list of all ongoing projects in which Ken Taylor is assisting developers and the developers are or will be seeking water line extension reimbursement from Cumberland Falls Highway District.

5. Refer to the hearing testimony of Johnny Collette, Malea Moses, and Michael Baird, generally, regarding the Extension of Water Main Tariff. Provide a list, including names and dates, of all previous instances in which Cumberland Falls Highway District has approved reimbursement pursuant to the Extension of Water Main Tariff.

6. Refer to the hearing testimony of Michael Baird and Johnny Collette, generally, regarding written policies and procedures.

a. State whether the district has an employee handbook. If so, provide a copy of the employee handbook.

b. State whether Cumberland Falls Highway District has a formal policy or procedure regarding the Extension of Water Main Tariff. If so, provide a copy of the policy or procedure.

7. Refer to the hearing testimony of Johnny Collette, generally, regarding the accuracy of the district's minutes. Provide a list of each month which Mr. Collette claims Cumberland Falls Highway District's meeting minutes were inaccurate. Provide documentary evidence, if any, which support Mr. Collette's statement that the minutes were inaccurate.

8. Provide the board of commissioners' meetings for February 2023 through the date of this Order, including any specially called meetings.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED APR 25 2023

cc: Parties of Record

*Amanda Hill
Esq.
Hill & Hill
400 South Main Street
P. O. Box 1605
Corbin, KENTUCKY 40702

*Cumberland Falls Highway Water District
6926 Cumberland Falls Highway
Corbin, KY 40701-8637