

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MONROE)
COUNTY WATER DISTRICT FOR RATE) CASE NO. 2017-00070
ADJUSTMENT PURSUANT TO 807 KAR 5:076)

MOTION TO TAKE WITNESS TESTIMONY BY DEPOSITION

Monroe County Water District (“Monroe District”), by counsel, moves for the Commission to allow its witness, Melissa A. Melton, to testify by deposition because Ms. Melton is unavailable to attend the scheduled hearing on September 27, 2017. Alternatively, Monroe District moves for the Commission to schedule a separate day of hearing for the purpose of taking Ms. Melton’s testimony. In support of its Motion, Monroe District states:

1. In its Order of August 18, 2017, the Commission ordered Monroe District to appear at a hearing on September 27, 2017 for the purpose of “presenting evidence on Monroe District’s application for rate adjustment pursuant to 807 KAR 5:076 and including, but not limited to, the issues of the level of employee benefits and the appropriate service lives assigned to its plant asset account groups.”

2. Monroe District wishes to present the testimony of Melissa A. Melton on the issues of employee benefits and wages. Ms. Melton is employed by Community Action Kentucky, Inc., a non-profit Kentucky corporation that is affiliated with the Rural Community Assistance Partnership (“RCAP”). RCAP is a national nonprofit organization that provides assistance to rural communities with populations of fewer than 10,000 persons to ensure access to safe drinking water and sanitary waste disposal. Ms. Melton is a certified Class III Water Distribution System operator and has been involved in the water and wastewater industry in Kentucky for over 30 years. Ms. Melton has served as an RCAP technical assistance provider

for 15 years. In that capacity, she routinely trains and assists water and wastewater utilities throughout the state of Kentucky with technical, managerial, and financial capacity issues. Ms. Melton currently assists East Logan Water District, Edmonson County Water District, Fountain Run Water District, Monroe District, South Logan Water Association, Western Rockcastle Water Association, and the cities of Bonnieville, Edmonton, Munfordville, Somerset, and Tompkinsville. She has significant experience and familiarity with water utilities in the Barren River Area Development District, of which Monroe District is one.

3. Ms. Melton would testify about her knowledge and experience regarding employee wages and benefits of Kentucky rural water and wastewater systems, and the tight market for persons with water-related skills. Ms. Melton would also testify about her survey of the wages and employee benefits of water industry contractors in Monroe County. Monroe District directly competes with these contractors for skilled employees.

4. Ms. Melton is unavailable to attend the scheduled hearing on September 27, 2017. On September 27th, Ms. Melton will be an instructor at the Central Kentucky Water & Wastewater Operators Association Annual Fall Conference in Lucas, Kentucky. Ms. Melton will have limited telephone service at the conference site.

5. Because Ms. Melton is unavailable to attend the scheduled hearing, Monroe District requests the Commission permit Monroe District to take Ms. Melton's deposition after the scheduled hearing at the Commission's offices. Monroe District believes Ms. Melton's knowledge and expertise will greatly assist the Commission reaching a fully informed decision in this proceeding. Monroe District further believes a deposition would be convenient for all parties to this proceeding and Commission Staff. Ms. Melton's office is located in Frankfort within walking distance of the Commission's office and she is generally available for a deposition the week of October 2 - 6, 2017.

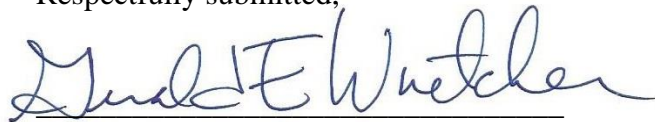
6. In the alternative, if the Commission does not allow Ms. Melton to testify in this proceeding by deposition, Monroe District requests the Commission continue the scheduled hearing after taking testimony on September 27, 2017 and schedule an additional hearing date at a mutually convenient time to receive Ms. Melton's testimony. Monroe District does not anticipate Ms. Melton's testimony will exceed one hour.

7. Counsel for Monroe District has contacted the Attorney General's ("AG") Office of Rate Intervention. The AG indicated that he will not object to Monroe District's Motion requesting Ms. Melton testify by deposition or on an additional hearing date.

WHEREFORE, Monroe District requests the Commission permit Melissa A. Melton to testify by deposition. Alternatively, Monroe District requests the Commission establish an additional hearing date for Ms. Melton's testimony.

Dated: September 22, 2017

Respectfully submitted,



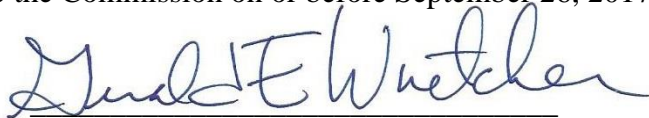
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Counsel for Monroe County Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Monroe County Water District's September 22, 2017 electronic filing of this Motion is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on September 22, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of this Motion will be delivered to the Commission on or before September 26, 2017.

A handwritten signature in blue ink, reading "Gerald E. Wuetcher", written over a horizontal line.

Gerald E. Wuetcher