

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:
ELECTRONIC APPLICATION OF
MARTIN COUNTY WATER DISTRICT
FOR AN ALTERNATIVE RATE
ADJUSTMENT**

Case No. 2021-00154

**MARTIN COUNTY CONCERNED CITIZENS, INC.'s
WITNESS AND EXHIBIT LIST**

Pursuant to the Commission's Order of August 26, 2021, the Martin County Concerned Citizens', Inc. ("MCCC"), by and through counsel, tenders the following witness and exhibit list.

WITNESSES

MCCC plans to call the following witnesses in this order:

1. Roger Colton, whose Direct Testimony was filed on September 6, 2021.
2. Nina McCoy, Chair of MCCC.
3. Lisa Stayton, Vice Chair of MCCC and Editor/Owner of the Mountain Citizen.

Roger Colton and Lisa Stayton will testify remotely. Nina McCoy will testify in person.

EXHIBITS

MCCC will rely on documents and other evidence that are present in the record in this matter. In addition, MCCC may submit the following as exhibits at the hearing:

1. Documents submitted as attachments to the Direct Testimony of Roger Colton;
2. The following documents from the record in 2020-00154:
 - a. July 15, 2021 Quarterly Activity Report and

- b. financial reports and minutes from the June, July, and August 2021 Martin County Utility Board meetings;
3. Example of current water bill;
4. Table derived from PSC records on water utility disconnection and reconnection reports from July 2018 to June 2021;
5. Table derived from complaints regarding Martin County Water District to the PSC from January 1, 2020 to August 25, 2021;
6. Table derived from PSC records on complaints filed regarding all water districts and water associations from January 1, 2020 to September 2, 2021;
7. Table derived from most recent water base rate spreadsheet provided by the Commission;
8. Posts and responses from the Facebook accounts of Martin County Water District, Martin County Water Warriors, and The Mountain Citizen from September 1, 2021 to the date of the hearing regarding recent water outages in Martin County; and
9. Martin County Water District's responses to data requests filed in this matter.

MCCC reserves the right to supplement or amend these lists and offer such witnesses or exhibits as may be necessary or appropriate to rebut any evidence offered at the hearing in this matter.

Respectfully Submitted,

/s/ Mary Varson Cromer

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Counsel for MCCC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing Witness and Exhibit List was served on all other parties pursuant to 807 KAR 5:001 on this the 16th day of September 2021.

/s/ Mary Varson Cromer