

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:

ELECTRONIC INVESTIGATION INTO THE)
FINANCIAL AND OPERATING CAPACITY OF)
RATTLESNAKE RIDGE WATER DISTRICT)
INCLUDING RATTLESNAKE RIDGE WATER)
DISTRICT AND ITS INDIVIDUAL) CASE NO.
COMMISSIONERS, AND MANAGER DAVID) 2021-00340
GIFFORD FOR ALLEGED FAILURE TO COMPLY)
WITH KRS 278.300 AS WELL AS POSSIBLE)
VACANCIES ON THE BOARD OF)
COMMISSIONERS OF RATTLESNAKE RIDGE)
WATER DISTRICT)

**RESPONSE OF RATTLESNAKE RIDGE WATER DISTRICT TO COMMISSION
STAFF'S SEVENTH REQUEST FOR INFORMATION TO RATTLESNAKE RIDGE
WATER DISTRICT**

1. Rattlesnake Ridge District's Board of Commissioners (Board) is comprised of commissioners from Elliott and Carter Counties. Rattlesnake Ridge District's service territory consists of five counties. Refer to KRS 74.020(1). Explain and provide any supporting documentation as to why only two counties have representation on the Board.

RESPONSE QUESTION 1: Pursuant to KRS 74.020(1), it is conclusively presumed that the additional counties of Lawrence, Morgan, and Lewis are deemed a minor portion of the total area served by RRWD as less than 25% of the total assets of the distribution system are located in Lawrence, Morgan, or Lewis Counties.

Rattlesnake Ridge Water District (hereinafter RRWD) bills a total of 4248 customers. This is comprised of Carter County with 2696 customers; Elliott County with 1106 customers (one of these emergency use only); Lawrence County with 412 customers;

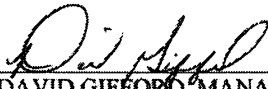
Lewis County with 4 customers; and Morgan County with 30 customers. Therefore, the distribution system is primarily in Carter County followed by Elliott County. Using number of customers only as a determination of total assets, Lawrence County is 9.6% of the distribution system; Lewis County is 0.009%; and Morgan County is 0.7%.

Attached hereto is the specific information regarding these customers, attached as Exhibit A.

Further, verification of the total assets of the distribution system is set forth in Exhibit B.

Therefore, based upon KRS 74.020(1), RRWD has complied with the appropriate statutory authority in only having commissioners from Carter and Elliott Counties.

The above Responses are true and correct to the best of my information, knowledge, and belief formed after reasonable inquiry.

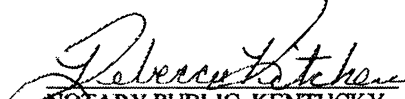


DAVID GIFFORD, MANAGER
RATTLESNAKE RIDGE WATER DISTRICT

COMMONWEALTH OF KENTUCKY
COUNTY OF Carter

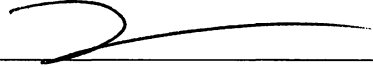
The foregoing instrument was sworn, subscribed, and acknowledged to before me this 18th day of October, 2023 by DAVID GIFFORD, Manager of Rattlesnake Ridge Water District, to be his free act and deed.

My commission expires: 11-6-23



NOTARY PUBLIC, KENTUCKY
NOTARY ID # 633477

Respectfully submitted,



DELORES WOODS BAKER
Local Counsel RRWD
134 W Third St
Maysville, KY 40156
606-564-7969
dwbaker@maysvilleky.net

CERTIFICATE OF SERVICE

I hereby certify that the foregoing with all attachments was served by postage prepaid, first class mail, on Oct. 18, 2023 to:

Lewis County Fiscal Court
122 Second Street
Vanceburg, KY 41179

Elliott County Local Government
P.O. Box 710
Sandy Hook, KY 41171

Carter County Fiscal Court
300 West Main Street
Grayson, KY 41143

Lawrence County Fiscal Court
122 South Main Cross Street
Louisa, KY 41230

Morgan County Office Building
450 Prestonsburg Street
West Liberty, KY 41472

Mr. Jim Gazay
Morgan County Judge Executive
450 Prestonsburg Street
West Liberty, KY 41472

Mr. Phillip Carter
Lawrence County Judge Executive
P.O. Box 566
Louisa, KY 41230

And by email on Oct 18, 2023 to:

John Lewis, Elliott County Attorney: attorneyjohnlewis@yahoo.com

Brian Bayes, Carter County Attorney: bbayes@prosecutors.ky.gov

Ben Harrison, Lewis County Attorney: bharrison@prosecutors.ky.gov

Brandon Burton, Carter County Judge Executive: ccjudgeexecutive@gmail.com


George Sparks, Lewis County Judge Executive: George.sparks@lewiscountky.gov

Myron Lewis, Elliott County Judge Executive: ejudge@mrtc.com

Johnny Osborne, Lawrence County Attorney: johnny@lcattorney.net

Myles Holbrook, Morgan County Attorney: Mholbrook@prosecutors.ky.gov

Respectfully submitted,



DELORES WOODS BAKER

Local Counsel RRWD

134 W Third St

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606-564-7969

dwbaker@maysvilleky.net

EXHIBIT A

Customers of RRWD by County

EXHIBIT A

CARTER COUNTY CUSTOMERS:

5/8" CARTER	WA	2679 -- residential
1"	WC	8 -- 1" lines
2"	WE	1 -- 2" lines services Brushy Creek Stone
3"	WF	2 -- 3" lines services Heritage School and Grayson Lake State Park
	WO	1 -- 6" line for golf course Grayson Lake
4" CARTER	WR	1 -- 4" line
CITY OF GRAYSON	WS	1 -- wholesale
CITY OF OLIVE HILL	WT	2 -- wholesale
	WY	1 -- services RRWD administrative office

ELLIOTT COUNTY CUSTOMERS:

5/8" ELLIOTT	WG	1104 -- residential
6" PRISON	WI	1 -- 6" line services Prison
	WK	1 -- Sandy Hook emergency use only

LAWRENCE COUNTY CUSTOMERS:

5/8" LAWRENCE	WH	411 -- residential
3" BIG SANDY	WQ	1 -- 3 " line

LEWIS COUNTY CUSTOMERS:

5/8" LEWIS	WL	4 --- residential
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MORGAN COUNTY CUSTOMERS:

5/8" MORGAN	WP	30 --- residential
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TOTAL

4248 customers

EXHIBIT B

Letter from RRWD engineer regarding assets



October 16, 2023

Ms. Delores Woods Baker
Attorney at Law
134 W. Third Street
Maysville, Kentucky 41056

Re: PSC Inquiry of Lawrence Co. Assets
Rattlesnake Ridge Water District

Dear Ms. Baker;

Pursuant to your request for information of the number of assets that are in Lawrence County as a subset within the whole of the Rattlesnake Ridge Water District, I have reviewed and concluded to the best of my knowledge the following:

- Number of Customers - 412 out of 4248 or 10%
- Number of pump stations – 1 (Diamond Ridge) out of 9 or 11%
- Number of storage tanks – 1 (Diamond Ridge) out of 13 or 8%
- Miles of water main – Approximately 65 miles out of approximately 460 miles or 14%

The above numbers are based on the WRIS System Data provided by the Kentucky Infrastructure Authority and recent capital improvements made by the Rattlesnake Ridge Water District.

It should be noted that RRWD also serves thirty (30) customers in Morgan County and four (4) customers in Lewis County. The assets in these two counties are minimal to the overall RRWD system.

If you have any questions, please contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Riley Sumner', is written over a horizontal line.

Riley Sumner
Project Manager

c: Mr. David Gifford, RRWD
File