

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KIRKSVILLE WATER ASSOCIATION, INC.)	
AND ITS INDIVIDUAL DIRECTORS)	
ARMON SANDERS, WAYNE LONG,)	
ALFRED WINKLER, RANDAL WEBB, AND)	2022-00197
BOBBY POWELL, AND MANAGER MIKE AGEE)	
ALLEGED FAILURE TO COMPLY)	
WITH KRS 278.300 AND KRS 278.020)	

**KIRKSVILLE WATER ASSOCIATION’S RESPONSE TO STAFF’S SECOND
REQUEST FOR INFORMATION**

COMES NOW THE PETITIONER, KIRKSVILLE WATER ASSOCIATION, by counsel, and states each answer provided is true and accurate to the best knowledge and belief of the witness signing the response. For its Response, Kirksville Water Association states as follows:

1. Reference the contract for services filed on September 26, 2022, in response to Commission Staff’s First Request for Information (Staff’s First Request). Provide any written documentation detailing the reasons that Madison County Utilities District and Kirksville Water terminated the agreement.

RESPONSE: No written documentation was provided. It was communicated through our counsel that MCUD was not going to renew the contract and notice was given.

Mike Agee

Mike Agee
Manager, KWA

2. Reference the contract for services filed on September 26, 2022, in response to Staff’s First Request for Information. Provide any written agreement between Case No. 2022-

00197 Madison County Utilities District and Kirksville Water for contractual services prior to 2017.

RESPONSE: Please see attached exhibit titled 2009 contract.

Mike Agee

Mike Agee
Manager, KWA

3. Provide any written legal opinion relied upon by Kirksville Water prior to obtaining financing for 1615 Foxhaven Dr., Richmond, Kentucky, as it relates to financing or regulatory approvals.

RESPONSE: No written opinion was provided.

Mike Agee

Mike Agee
Manager, KWA

4. Provide the invoices, receipts, and all other documentation for the improvements and modifications made to 1615 Foxhaven Dr., Richmond, Kentucky.

RESPONSE: Please see attached 11 exhibits titled receipts.

Mike Agee

Mike Agee
Manager, KWA

Respectfully submitted,

Jud Patterson

Jud Patterson
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Counsel for KWA