

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In re: the matter of:

ELECTRONIC APPLICATION OF CUMBERLAND	)	CASE NUMBER
FALLS HIGHWAY WATER DISTRICT FOR A	)	2022-00365
DEVIATION	)	

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

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Comes now the Cumberland Falls Highway Water Department, by and through counsel, and for its Response to Commission Staff's Post-Hearing Request for Information, states and provides as follows:

REQUEST 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.

RESPONSE: See attached, as follows: Emails sent from K. Taylor to M. Sparks dated February 2, 2021, with referenced attachments (cost projection for phase 1, line extension contract, contract for extension of water main, cost projection); Email sent from K. Taylor to M. Sparks dated December 28, 2021, with referenced attachments (cost projections, line extension contract, contract for extension of water main). Ken Taylor can attest to the information contained in this response.

REQUEST 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.

RESPONSE: See attached, as follows: Email sent from M. Sparks dated December 28, 2021, with referenced attachment (signed Requirements for Line Extension Contract). Michael Sparks can attest to the information contained in this response

REQUEST 3. Refer to the hearing testimony of Ken Taylor, Michael Baird, and Johnny Collette, generally, regarding Ken Taylor's business relationship with 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 employee contract exists, provide a copy of the executed contract.

RESPONSE: See attached affidavit, which is and can be attested to by Kenneth Taylor.

REQUEST 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.

RESPONSE: Kenneth Taylor is currently not assisting any developers associated with CFHWD, arguably with the exception of the ongoing projects of Michael Sparks and Jeffrey Sparks. Generally Mr. Taylor's involvement ends once the project is permitted by the Kentucky Division of Water. Kenneth Taylor has kept up with the construction on the Sparks' projects through Mike Baird and information provided at scheduled board meetings. Kenneth Taylor can attest to this information.

REQUEST 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.

RESPONSE: See attached spreadsheet. Michael Baird, as manager, can attest to this information.

REQUEST 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.

RESPONSE: Please see attached Employee Policy Manual. CFHWD does not have a formal policy or procedure regarding the Extension of Water Main Tariff, excluding documents already provided relative to this action. Michael Baird, as manager, can attest to this information.

REQUEST 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.

RESPONSE: Attached is a list provided by Mr. Collette regarding information in the minutes with which he disagrees. No documentary evidence exists in support of this information (although tapes of the meetings can be provided upon request). Johnny Collette can attest to the information contained in this response.

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

RESPONSE: See attached. Michael Baird, as manager, can attest to this information.

RESPECTFULLY SUBMITTED,

/s/ Amanda Hill

HON. AMANDA HILL  
400 SOUTH MAIN STREET  
P.O. BOX 1605  
CORBIN, KENTUCKY 40702  
TELEPHONE: (606) 528-7181  
FACSIMILE: (606) 528-7183  
ELECTRONIC MAIL: amanda@hill.legal



## ATTACHMENTS

- (A) Emails from K. Taylor to M. Sparks where Contract for Extension of Water Main was referenced or attached.
- (B) Emails from M. Sparks to K. Taylor where Contract for Extension of Water Main was referenced or attached.
- (C) Affidavit from K. Taylor.
- (D) List from CFHWD of all previous instances in which Cumberland Falls Highway District has approved reimbursement pursuant to the Extension of Water Main Tariff.
- (E) Employee Handbook.
- (F) List provided by Mr. Collette regarding information in the minutes with which he disagrees.
- (G) Minutes from February, 2023 to present.