

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**RE: ELECTRONIC TARIFF FILING OF THE CITY OF
AUGUSTA TO INCREASE THE WHOLESALE
WATER RATE CHARGED TO BRACKEN
COUNTY WATER DISTRICT**

**INTERVENOR, BRACKEN COUNTY WATER DISTRICT'S (BCWD'S) NOTICE OF WITNESS
LIST AND EXHIBITS TO BE USED AT HEARING IN THIS MATTER**

CASE NUMBER 2024-00349

Comes now the intervening party, Bracken County Water District, ("BCWD"), by and through counsel, Mr. Jesse P. Melcher, Esq., and hereby files Notice of its witnesses and exhibit list, for the hearing to be held on July 31, 2025, as follows:

BCWD would request to call the following witnesses:

WITNESSES:

- A) Rick King, Vice-chairman of the BCWD;
- B) Anthony Habermehl, chairman of BCWD;
- C) City of Augusta Mayor, John Laycock;
- D) City of Augusta, Water Treatment Plant Supervisor/Director, Doug Padgett;
- E) City of Augusta Water Rate Study author, Scott Lawless;
- F) Any other person/entity that sponsored, submitted and/or verified testimony, response and/or filed document herein.
- G) Any necessary available rebuttal witness to cross-examination testimony and/or additional direct testimony;

EXHIBITS:

BCWD would request admission of the following exhibits:

- a) water purchase contract between the parties as executed in 2016 and as amended in 2021, as it relates to the wholesale water rate calculation methodology. *See. KY PSC Website, Commission Records, Current Tariffs, Water, Water Districts, Bracken County Water District, Contracts, City of Augusta, 2016-04-21-First Amendment to Water Purchase Contract.pdf & 2016-04-21-Water Purchase Contract.pdf;*
- b) The tariff filing of the City of Augusta, including the audits of City of Augusta ending June 2022 and June 2023, and the water rate study. *See. 20240926_Augusta Tariff Filing.pdf;*
- c) All answers by the City of Augusta as filed herein, on 1-6-25, 2-6-25, and 6-18-25, to questions by the intervenor herein. *See. DR_1_BCWD_Augusta_Response.pdf, DR_2_BCWD Augusta_Response.pdf, City of Augusta _-DR_to_Bracken_County.pdf;*
- d) The answers by the City of Augusta as filed herein on 12-31-24, to questions by the City of Augusta. *See. First_Response_to_Commission Staffs First Request.*
- e) BCWD does not intend to introduce any other exhibits of its own, but intends to make any document and/or filing already filed herein, not already mentioned, and which is not excluded from evidence and/or testimony prior

to the hearing date or at the hearing, and which has been introduced or stated by City of Augusta herein; for implementation of BCWD's cross-examination of the witnesses of City of Augusta and exhibits presented by the City of Augusta.

Respectfully submitted,

/s/ JESSE P. MELCHER, ESQ.
BRACKEN COUNTY WATER DISTRICT,
ATTORNEY
JESSE MELCHER LAW OFFICE, PLLC
MR. JESSE P. MELCHER, ESQ.
P.O. BOX 345
MOUNT OLIVET, KY 41064
606-724-5322 (phone)
jpmelcher@yahoo.com

CERTIFICATE OF SERVICE

I, Jesse P. Melcher, Esq. as counsel and representative of BCWD herein, do hereby certify that I have mailed out by electronic filing through the KY PSC web portal, pursuant to 807 KAR 5:001(8), this the 23rd day of July, 2025; and that no party herein, has opted out of the electronic notice and/or filing herein, and proof of electronic filing and courtesy copy are as follows, of BCWD's notice of witnesses and exhibit list:

KY PSC, filed by web portal in this case number

Ms. Cynthia Thompson, Esq.
Counsel for City of Augusta
ccthompsonatty@yahoo.com

Mr. Evan Buckley, Esq.
Counsel for City of Augusta
Evan.buckley@dinsmore.com

Mr. Edward T. Depp, Esq.
Counsel for City of Augusta
Tip.depp@dinsmore.com

Mr. Brooks Herrick, Esq.
Counsel for City of Augusta
[Brooks.herrick@ dinsmore.com](mailto:Brooks.herrick@dinsmore.com)

/s/ MR. JESSE P. MELCHER, ESQ.