

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO MARTIN)
COUNTY WATER DISTRICT AND ITS)
INDIVIDUAL COMMISSIONERS (TIMOTHY)
THOMA, GREG CRUM, NINA MCCOY, VERNON) CASE NO.
ROBINSON, JOHN HENSLEY, AND COLBY KIRK) 2026-00065
AND ITS MANAGER TODD ADAMS, FOR)
ALLEGED FAILURE TO COMPLY WITH)
KRS 278.300)

MOTION FOR INFORMAL CONFERENCE

Martin County Water District (“Martin District”), by counsel, respectfully requests that the Commission conduct an informal conference with Martin District to discuss this matter and any other pending matters so that the Commission can better understand the position of Martin District and its efforts to effectively manage water services in Martin County. Martin District requests that the informal conference be conducted between its representative, Chairman Timothy Thoma, and the Commission in person in Frankfort, Kentucky. Martin District requests that the informal conference address the subject case which relates to **Case No. 2025-00249**, retroactive approval of truck leases; **Case No. 2020-00154** Motion to Close Case and End Monitoring Requirements of Order Entered July 22, 2020; and any other pending matters related to Martin District. Martin District is hopeful that such an informal conference will be informative to the Commission and helpful in making decisions concerning Martin District.

For purposes of keeping the Commission fully informed, Martin District notes that Todd Adams is no longer manager for Alliance Water Resources. Instead, that position is being temporarily filled by Erica Bogenpohl, PE of Alliance Water Resources. Also, Greg Crum was not

a board member at the time of the truck lease discussions and is not now a board member. Martin District also requests that the informal conference meets the requirement for written response by each Board member, Martin District and its Manager and that the need for any additional response be held in abeyance pending conduct of the requested informal conference.

WHEREFORE, for the foregoing reasons, Martin County Water District, by counsel, respectfully requests that the Commission conduct an informal conference with Martin District to discuss this matter and any other pending matters. Martin District also requests that the informal conference meets the requirement for written response by each Board member, Martin District and its Manager and that the need for any additional response be held in abeyance pending conduct of the requested informal conference. Martin District requests PSC work with Martin District to schedule the informal conference to allow Chairman Thoma, Treasurer Colby Kirk, and counsel attend in person.

Respectfully submitted,
KINKEAD & STILZ, PLLC

/s/ Dustin C. Haley
Dustin C. Haley
1505 Carter Avenue,
P.O. Box 2008
Ashland, KY 41105-2008
dhaley@ksattorneys.com
Telephone (606) 329-1919
**COUNSEL FOR MARTIN COUNTY
WATER DISTRICT**

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was served via electronic filing on this the 7th day of April, 2026, to the following:

Public Service Commission
P.O. Box 615
Frankfort, KY 40602

/s/ Dustin C. Haley
Dustin C. Haley