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COMMISSION

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February 2, 2018

Gwen R. Pinson, Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

RE: Martin County Concerned Citizens Inc.'s
Motion for an Expedited Hearing Regarding the Current Water Crisis
PSC Case No. 2016-142

Dear Ms. Pinson,

I enclose here an original and five copies of Martin County Concerned Citizens Inc.'s Motion to Incorporate the ARF Proceedings and Motion for Leave to Depose Joe Hammond.

I also send a copy of this motion to counsel for the Martin County Water District by U.S. mail and electronic mail today.

Please contact me if you have any questions regarding this filing.

Sincerely,



Mary Varson Cromer

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

INVESTIGATION OF THE
OPERATING CAPACITY OF
MARTIN COUNTY WATER
DISTRICT PURSUANT TO KRS
278.280

Case No 2016-00142

MARTIN COUNTY CONCERNED CITIZENS, INC.'S MOTION TO
INCORPORATE ARF PROCEEDINGS AND MOTION FOR LEAVE TO DEPOSE
JOE HAMMOND

Martin County Concerned Citizens, Inc. ("MCCC"), by and through counsel, submits this Motion pursuant to 807 KAR 5:001 Sec. 5. With this Motion, MCCC asks for an order incorporating the proceedings in Case No. 2018-00017 into the record of this proceeding by reference. MCCC also asks for an order granting leave to take the deposition of the Martin County Water District General Manager, Joe Hammond. In support of this motion, MCCC states as follows:

1. On January 22, 2018, the Commission ordered that the proceedings of this investigation be incorporated by reference into the proceedings of Case No. 2018-00017.
2. Matters that may arise in the district's rate case may be relevant and material to the Commission's investigation herein.
3. For that reason, MCCC asks that the records of the proceedings in the district's rate case be incorporated by reference into these proceedings.
4. MCCC also requests leave to take the deposition of Joe Hammond pursuant to KRS 278.340.

5. KRS 278.340 provides, “[t]he commission itself may take depositions, or grant deposition rights at its discretion to any party in a proceeding before the commission. Depositions in commission proceedings shall be taken in accordance with the Rules of Civil Procedure.”
6. MCCC believes that the deposition of the district’s General Manager Joe Hammond is the most efficient method of deriving information to be presented to the Commission regarding the management and oversight of the district’s expenses and employees.

WHEREFORE, MCCC respectfully asks this Commission for an Order with the following provisions:

- a) Incorporating the proceedings of Case No. 2018-00017 into this record by reference; and
- b) Granting MCCC leave to take the deposition of the district’s General Manager Joe Hammond.

Respectfully Submitted,



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DATED: Feb. 2, 2018

CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001 Sec. 6, I, Mary Varson Cromer, hereby certify that on February 2, 2018, a true and accurate copy of the foregoing Motion was served via electronic mail and postage-paid U.S. mail to the following:

Brian Cumbo
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cumbolaw@cumbolaw.com
Counsel for Martin County Water District


