

RECEIVED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

JUL 20 2018
PUBLIC SERVICE
COMMISSION

In The Matter Of:

**THE APPLICATION OF THE
MARTIN COUNTY WATER
DISTRICT FOR ALTERNATIVE
RATE ADJUSTMENT**

Case No. 2018-00017

**MARTIN COUNTY CONCERNED CITIZENS, INC.'S MOTION FOR
ISSUANCE OF SUBPOENAS**

Martin County Concerned Citizens, Inc. ("MCCC"), by and through counsel, submits this Motion pursuant to 807 KAR 5:001 Sec. 5, respectfully asking the Commission to sign and issue the attached subpoenas pursuant to its authority in 807 KAR 5:001 Sec. 4(6). In support of this Motion, MCCC states as follows:

1. By Order on June 28, 2018, the Commission scheduled the next hearing in this matter for August 7, 2018.
2. MCCC believes that the testimony of certain witnesses is necessary for the Commission to fully consider the issues before it in this matter.
3. MCCC seeks to call the four witnesses identified in the attached subpoenas to testify regarding the following matters:
 - a. Alan Vilines. On June 6, 2018, the Martin District filed a Motion for Extension of Time to respond to the Commission's staff report. In that motion, the Martin District indicated that Mr. Vilines prepared the rate application on behalf of the Martin District. MCCC seeks Mr. Vilines' testimony regarding that preparation.

b. Linda Sumpter. Ms. Sumpter is a private C.P.A. who provides contractual services to the Martin District. MCCC seeks her testimony regarding the rate application and the current revenue needs of the Martin District.

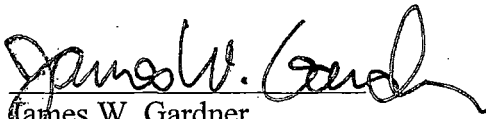
c. Jimmy Don Kerr. Mr. Kerr is the Treasurer of the Martin County Utilities Board. MCCC seeks Mr. Kerr's testimony regarding the current revenue needs of the Martin District.

d. Greg Scott. Mr. Scott is the Interim General Manager of the Martin District. MCCC seeks Mr. Scott's testimony regarding the current revenue needs of the Martin District.

4. This Motion is filed more than two weeks before the scheduled hearing. That period should provide sufficient time for the Martin District to respond to this Motion if it chooses to do so, for the Commission to issue an Order, and for issuance and service of the subpoenas.

For the foregoing reasons, MCCC respectfully moves the Commission to sign and issue the four subpoenas attached hereto.

Respectfully submitted,



James W. Gardner
M. Todd Osterloh
STURGILL, TURNER, BARKER & MOLONEY,
PLLC
333 W. Vine St., SUITE 1500
Lexington, Kentucky 40507
Telephone: 859-255-8581
Facsimile: 859-231-0851
jgardner@sturgillturner.com
tosterloh@sturgillturner.com

and

Mary Varson Cromer
Appalachian Citizens' Law Center, Inc.
317 Main Street
Whitesburg, Kentucky 41858
Telephone: 606-633-3929
Facsimile: 606-633-3925
mary@appalachianlawcenter.org

Counsel for MCCC

CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001 Sec. 6, I, James W. Gardner, hereby certify that on July 20, 2018, a true and accurate copy of the foregoing Motion for Issuance of Subpoenas was served via postage-paid U.S. mail to the following:

Brian Cumbo
86 W. Main St., STE 100
P.O. Box 1844
Inez, KY 41224
cumbolaw@cumbolaw.com
Counsel for Martin County Water District


Counsel for the MCCC

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: THE APPLICATION OF THE MARTIN
COUNTY WATER DISTRICT FOR
ALTERNATIVE RATE ADJUSTMENT)
) CASE NO. 2018-00017
)

SUBPOENA

1. The Public Service Commission TO: Alan H. Vilines

2. You are commanded to appear before the Public Service Commission, 211
Sower Boulevard, Frankfort, Kentucky 40602.

3. At 9 A.M.

4. On the 7th day of August 2018 at _____

5. x To testify on behalf of Martin County Concerned Citizens

_____ To produce _____

_____ To give depositions _____

Date: 7/20/18

Commissioner, Public Service Commission
James H. Gaudin
Requesting Attorney

This subpoena was served by delivery of a true copy to:
Alan H. Vilines, 690 Scottsborough Circle, Bowling Green, KY 42103-8709

This _____ day of _____

By _____ Title _____

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: THE APPLICATION OF THE MARTIN
COUNTY WATER DISTRICT FOR
ALTERNATIVE RATE ADJUSTMENT)
) CASE NO. 2018-00017
)

SUBPOENA

1. The Public Service Commission TO: Linda Sumpter, C.P.A.

2. You are commanded to appear before the Public Service Commission, 211
Sower Boulevard, Frankfort, Kentucky 40602.

3. At 9 A.M.

4. On the 7th day of August 2018 at _____

5. x To testify on behalf of Martin County Concerned Citizens

_____ To produce _____

_____ To give depositions _____

Date: 7/20/18

Commissioner, Public Service Commission
James W. Cochran
Requesting Attorney

This subpoena was served by delivery of a true copy to:
Linda Sumpter, 910 Blackberry Road, Inez, Kentucky 41224

This _____ day of _____

By _____ Title _____

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: THE APPLICATION OF THE MARTIN
COUNTY WATER DISTRICT FOR
ALTERNATIVE RATE ADJUSTMENT)
) CASE NO. 2018-00017
)

SUBPOENA

1. The Public Service Commission TO: Jimmy Don Kerr, Treasurer, Martin
County Utilites Board

2. You are commanded to appear before the Public Service Commission, 211
Sower Boulevard, Frankfort, Kentucky 40602.

3. At 9 A.M.

4. On the 7th day of August 2018 at _____

5. x To testify on behalf of Martin County Concerned Citizens

_____ To produce _____

_____ To give depositions _____

Date: 7/20/18

Commissioner, Public Service Commission
James W. Gardner
Requesting Attorney

This subpoena was served by delivery of a true copy to:
Jimmy Don Kerr, P.O. Box 1389, Inez, KY 41224

This _____ day of _____

By _____ Title _____

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: THE APPLICATION OF THE MARTIN
COUNTY WATER DISTRICT FOR
ALTERNATIVE RATE ADJUSTMENT)
) CASE NO. 2018-00017
)

SUBPOENA

1. The Public Service Commission TO: Greg Scott, Interim General Manager,
Martin County Water District

2. You are commanded to appear before the Public Service Commission, 211
Sower Boulevard, Frankfort, Kentucky 40602.

3. At 9 A.M.

4. On the 7th day of August 2018 at _____.

5. To testify on behalf of Martin County Concerned Citizens

_____ To produce _____

_____ To give depositions _____

Date: 7/20/18

Commissioner, Public Service Commission
James W. Gardner
Requesting Attorney

This subpoena was served by delivery of a true copy to:
Greg Scott, MCWD, 1014 Main Street, Inez, Kentucky 41224

This _____ day of _____

By _____ Title _____