

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

GARY A. SMITH)		
)	COMPLAINANT	
)		
V.)		CASE NO.
)		2024-00302
BLUEGRASS WATER UTILITY OPERATING)		
COMPANY, LLC)		
)	DEFENDANT	
)		

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC

Bluegrass Water Utility Operating Company, LLC (Bluegrass Water), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 7, 2025. The Commission directs Bluegrass Water to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission mandated electronic filing, with exception to *pro se* formal complaints filed against utilities). *Pro se* parties in formal complaint cases may submit responses by U.S. Mail addressed to the Public Service Commission at 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615, or by electronic email sent to PSCED@ky.gov. Responses filed using electronic email should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Bluegrass Water shall make timely amendment to any prior response if Bluegrass Water obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Bluegrass Water fails or refuses to furnish all or part of the requested information, Bluegrass Water shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Bluegrass Water shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

A copy of this request and any responses provided by Bluegrass Water shall be served on Gary A. Smith by U.S. certified mail, return receipt requested at 2410 Cincinnati Road, Georgetown, Kentucky 40324.

1. Please refer to the Energy and Environment Cabinet's, Department for Environmental Protection letter dated February 22, 2023, from the Municipal Water Pollution Prevention Program Coordinator, Chris Luffy.

a. Provide the response from Bluegrass Water to the Energy and Environment Cabinet

b. State whether the Delaplain Disposal's capacity has been increased. If not, state when it will be increased.

c. State what, if any, progress has made in complying with all pertinent regulations, permits, and orders.

d. State whether the Exemption Request submitted for the R and L Carriers Georgetown Development project was granted.

e. State whether any other Exemption Requests were granted in the years 2021-2025 for connection to Delaplain Disposal.

2. Provide the most recent inspection of the Delaplain Disposal by the Energy and Environment Cabinet's Department for Environmental Protection.

3. Provide the most recent three Discharge Monitoring Reports for Delaplain Disposal.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **FEB 05 2025**

cc: Parties of Record

Gary A. Smith
2410 Cincinnati Road
Georgetown, KENTUCKY 40324

*Bluegrass Water Utility Operating Company, LLC
1630 Des Peres Road, Suite 140
St. Louis, MO 63131