

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|-----------------------------------|---|------------|
| BERNICE COYLE WATSON TACKETT |) | |
| |) | |
| COMPLAINANT |) | |
| |) | CASE NO. |
| V. |) | 2025-00148 |
| |) | |
| BLUEGRASS WATER UTILITY OPERATING |) | |
| COMPANY, LLC |) | |
| |) | |
| DEFENDANT |) | |

COMMISSION STAFF'S THIRD 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 February 24, 2026. 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

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.

information provided. Each response shall be answered under oath or, for 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 shall be served on Ms. Bernice Coyle Watson Tackett, care of Mr. Charles Tackett II power of attorney, for Ms. Bernice Coyle Watson Tackett, by

U.S. Postal Service, First-Class Mail, to 2029 Longview Drive, Georgetown, Kentucky 40324.

Regarding Longview/Homestead Wastewater Treatment Plant (Longview WWTP), located at 3243 Frankfort Road, Georgetown, Kentucky 40324:

1. Refer to Bluegrass Water's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1(d) in which Bluegrass Water stated in pertinent part as follows:

There was no video taken during the March 1, 2025 inspection; rather, this routine inspection consists of a visual inspection of the collection system to check for overflows, exposed piping, manhole conditions, and alarm status.

a. State whether or not anything was used to visually inspect the interior of the pipe, such as a scope.

b. If a sewer scope was used, explain why the root intrusions observed in the March 21, 2025 video were not observed on March 1, 2025 inspection.

2. Refer to Bluegrass Water's response to Staff's Second Request, Item (1)(e) in which Bluegrass Water stated in pertinent part as follows:

During the Collection System Preventative Maintenance Checklist conducted on March 1, 2025, Clearwater Solutions did not observe any abnormal conditions, including, but not limited to, any root intrusions. For work orders such as the Collection System Preventative Maintenance Checklist, the Utility Cloud interface prompted operators to note whether the collection system "passed" or "failed" the inspection. Clearwater Solutions indicated that the collection system "passed" inspection on this date. See also "Exh. DR 2-1(b) Response – Utility Cloud WO – 3.1.25.xlsx." [Emphasis added]

a. If a scope was not used, explain how Clearwater Solutions inspected for root intrusions.

b. Confirm it is Bluegrass Water's position that the root intrusions observed in the March 21, 2025 video grew within the pipe within the 20 days following the March 1, 2025 inspection. Explain the response.

A handwritten signature in blue ink that reads "Linda Bridwell RP".

Linda C. Bridwell, PE
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601-8294

DATED FEB 06 2026

cc: Parties of Record

Bernice CW Tackett
2029 Longview Drive
Georgetown, KY 40324

*Bluegrass Water Utility Operating Company, LLC
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St. Louis, MO 63131