

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BLUEGRASS	)	
WATER UTILITY OPERATING COMPANY, LLC	)	CASE NO.
FOR CERTIFICATES OF CONVENIENCE AND	)	2022-00104
NECESSITY FOR PROJECTS AT THE	)	
DELAPLAIN SITE	)	

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

Bluegrass Water Operating Company, LLC (Bluegrass Water), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on January 20, 2023. The Commission directs Bluegrass Water to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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 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

---

<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 when made or, though correct when made, is now incorrect 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.

1. Refer to Application, page 4, paragraph 12, regarding benefits of installing a polymer feed to reduce solids; Application page 5, paragraph 16 stating "Bluegrass anticipates no change to current operating costs due to proposed improvements;" Case No. 2022-00102,<sup>2</sup> Bluegrass Water responses to Commission Staff's First Request for Information, Item 20, indicating that a polymer feed would not address accumulated solids

---

<sup>2</sup> Case No. 2022-00102, *Electronic Application of Bluegrass Water Utility Operating Company, LLC for Certificates of Convenience and Necessity for Projects at the Herrington Haven Site.*

and could worsen the problem; Case No. 2022-00102, Bluegrass Water responses to Commission Staff's Second Request for Information, Item 6d, indicating that a polymer feed requires an increased operations and maintenance (O&M) expense.

a. Explain why a polymer feed in the project in Case No. 2022-00102 may not have reduced solids and may have increased them, but the proposed polymer feed in Case No. 2022-00104 would.

b. Explain why a polymer feed in the project in Case No. 2022-00102 would have created additional O&M expense but the proposed polymer feed in Case No. 2022-00104 would not.

2. Refer to Corrective Action Plan, response to Commission Staff's First Request for Information (Response to Staff's First Request), Item 24, KY2022-00104\_BW\_419, referring to a "second phase of improvements." Provide estimated construction costs of these improvements and annual O&M expenses.

3. Refer to Enforcement and Compliance History Online (ECHO) exceedance report, Response to Staff's First Request, Item 4, KY2022-00104\_BW\_375.

a. Identify any planned, unplanned, or completed projects or actions necessary to prevent *E.coli* or chlorine exceedances noted in the ECHO report.

b. Provide estimated construction costs of these projects and annual O&M expenses.

c. If insufficient actions have been undertaken to correct these exceedances, explain why.



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

DATED DEC 27 2022

cc: Parties of Record

Case No. 2022-00104

\*Kathryn A Eckert  
McBrayer PLLC  
201 East Main Street  
Suite 900  
Lexington, KENTUCKY 40507

\*Katherine Yunker  
McBrayer PLLC  
201 East Main Street  
Suite 900  
Lexington, KENTUCKY 40507

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