

RECEIVED

MAR 13 2015

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BULLITT UTILITIES, INC.,) CASE NO.
FOR A CERTIFICATE OF CONVENIENCE AND) 2014-00255
NECESSITY, AND SURCHARGE FOR SAME)

ATTORNEY GENERAL'S FIRST REQUEST FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this First Request for Information to Bullitt Utilities, Inc., d/b/a Hunters Hollow Sewer ("Bullitt Utilities" or "the Company") to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the specific portion of the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for Bullitt Utilities with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the Company receives or generates additional information within the

scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, please request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the Company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded

statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

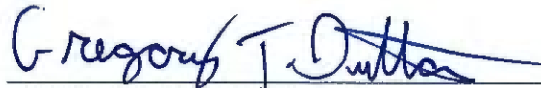
(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the Company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,

JACK CONWAY
ATTORNEY GENERAL



JENNIFER BLACK HANS
GREGORY T. DUTTON
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE, SUITE 200
FRANKFORT KY 40601-8204
(502) 696-5453
FAX: (502) 573-1005


Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Honorable Robert C Moore
Hazelrigg & Cox, LLP
415 West Main Street
P.O. Box 676
Frankfort, KENTUCKY 40602

Bullitt Utilities, Inc. dba Hunters Hollow
Sewer 1706 Bardstown Road Louisville, KY
40205

this 13th day of March, 2015



Assistant Attorney General

Application of Bullitt Utilities, Inc., For a Certificate of Convenience and Necessity, and Surcharge for Same
Case No. 2014-00255
Attorney General's Initial Requests for Information

1. Reference the Application generally. Explain how Bullitt Utilities determined the monthly surcharge amount of \$32.19 per month. Please provide all worksheets in native format with calculations and cells intact.
2. Reference Exhibit A to Bullitt Utilities Notice of Filing dated February 23, 2015. Please explain the "Agency Collection Fee" totaling \$9,029.
3. Reference Exhibit C to Bullitt Utilities Notice of Filing dated February 23, 2015. Please confirm that the customer accounts listed in two schedules total 711 total customers. Please reconcile this to Bullitt Utilities' assertion in its application that it currently serves 696 customers.
4. Regarding the catastrophic failure of the wastewater treatment plant ("WWTP"), please answer the following regarding the plant prior to the date of failure:
 - a. Was the WWTP or any components or appurtenances thereof subject to warranty?
 - b. If the answer to a. is yes, please provide a copy of the warranty?
 - c. If the answer to a. is yes, please advise whether Bullitt Utilities has or intends to recover under the warranty?
 - d. If the answer to a is no, why was neither the plant nor any components or appurtenances subject to warranty. Explain fully.
5. Regarding the catastrophic failure of the wastewater treatment plant ("WWTP"), please answer the following regarding the plant prior to the date of failure:
 - a. Was the WWTP or any components or appurtenances thereof insured against catastrophic failure?
 - b. If the answer to a. is yes, please provide a copy of the insurance policy?
 - c. If the answer to a is yes, please advise whether Bullitt Utilities has or intends to file a claim under the insurance policy?
 - d. If the answer to a. is no, why was neither the plant nor any components or appurtenances insured. Explain fully.
6. On an ongoing basis provide any the amount of any penalties paid to DOW as a result of the facility failure.
7. Reference the Application, paragraph 29, line N. Itemize the attorney fees by costs associated with PSC regulatory matters and costs associated with DOW regulatory matters.
8. Provide a list and description of each service Bullitt Utilities intends to provide over the 7 years during which it has proposed to collect the surcharge.
9. On an ongoing basis, provide any correspondence between Bullitt Utilities and DOW regarding the Hunters Hollow WWTP.

Application of Bullitt Utilities, Inc., For a Certificate of Convenience and Necessity, and Surcharge for Same
Case No. 2014-00255

Attorney General's Initial Requests for Information

10. For the years 2005 through March 29, 2014, provide an itemized list of maintenance and expenses associated with maintenance on the Hunters Hollow WWTP aeration tank prior to its failure.
11. For the years 2005 through March 29, 2014, provide any maintenance or inspection documents associated with the aeration tank prior to its failure.