

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF KENTUCKY-AMERICAN)
WATER COMPANY FOR A CERTIFICATE OF)
CONVENIENCE AND NECESSITY AUTHORIZING) CASE NO.
THE CONSTRUCTION OF KENTUCKY RIVER) 2007-00134
STATION II, ASSOCIATED FACILITIES AND)
TRANSMISSION MAIN)

**CITIZENS FOR ALTERNATIVE WATER SOLUTION'S DATA REQUEST TO
THE KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Pursuant to the scheduling order adopted by the Commission in this case, Citizens for Alternative Water Solutions (CAWS) requests that the Kentucky Industrial Utility Customers, Inc. (KIUC) file with the Commission the following information, with a copy to all parties of record, within the time specified in the Commission's Order. For each response to data request,

(1) Please identify the individual responsible for answering each request.

(2) These requests shall be deemed continuing so as to require further and supplemental responses if KIUC receives or generates additional information within the scope of these requests between the time of the response and the time of the hearing.

(3) A request to identify a document means to state the date or dates, author or originator, the subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian.

(4) To the extent that the specific document, study or information requested does not exist, but a similar document, study or information does exist, please provide the similar document, study or information.

(5) 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.

(6) If KIUC objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify CAWS' Attorney of Record as soon as possible.

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

(8) 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; 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.

(9) Where the information requested is the same as has been provided to another party in response to data request, it is sufficient to identify that response rather than duplicating the information requested.

Data Request No. 1

Has the KIUC adopted a formal position concerning whether the Public Service Commission (PSC) should issue the Certificate of Public Convenience and Necessity (CPCN) requested by Kentucky American Water Company (KAWC) in this case?

a. If so, what is that position?

b. Please provide all studies, reports, analyses, and other bases relied upon in support of that position. To the extent that those documents are already of record in this proceeding, a reference to the title, author and date of the document will be sufficient.

Data Request No. 2

Please provide the criteria and / or standards against which the KIUC measured the merits or lack of merit of the KAWC Pool 3 Project, and whether the KIUC has conducted similar assessments using the same criteria or standards for other alternatives that would meet the supply or treatment needs of KIUC customers as would be addressed by the Pool 3 Project?

Data Request No. 3

With respect to water supply for KIUC members' needs, does KIUC advocate for the least cost option for meeting those water supply needs? If yes, would you support an alternative to the KAWC Plan if it another plan were deemed the least cost option?

Data Request No. 4

Has KIUC reviewed the proposal made by Louisville Water Company (LWC) to the Lexington-Fayette Urban County Government on July 10, 2007 in which the LWC estimated the total construction cost to build a finished water pipeline from the LWC connection to the KAW station in North Fayette County would be \$56 Million Dollars?

Data Request No. 5

Do you know the estimated cost of the KAWC proposal as submitted to the PSC?

Data Request No. 6

Has KIUC considered alternatives to the KAWC proposal?

Data Request No. 7

To what extent do KIUC customers have flexibility to continue routine manufacturing, electricity production, or other activities in the absence of water supply? Is there any value to KIUC customers in the availability of a second source of supply (i.e. Ohio River) in lessening the vulnerability of the water supplies to KIUC customers to interruption?

Data Request No. 8

What is the aggregate annual and peak demand of the KIUC customers on water supply from the KAWC system? If necessary, approximate the demand.

Data Request No. 9

What conservation measures are employed by KIUC members to manage their water demand?

Data Request No. 10

Do KIUC members who are KAWC customers receive any incentives from KAWC for conservation measures?

Respectfully submitted,



Tom FitzGerald
Kentucky Resources Council, Inc.
P.O. Box 1070
Frankfort, Kentucky 40602

(502) 875-2428

Counsel for Citizens for Alternative
Water Solutions, Inc. (CAWS)

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies have been filed with the Commission and that a true and correct copy has been served by first-class mail upon the following individuals this 13th day of August, 2007:

Hon. A.W. Turner Jr.
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

Hon. Lindsey Ingram Jr.
Hon. Lindsey Ingram, III
Stoll Keenon Ogden PLLC
300 West Vine Street Suite 2100
Lexington, Kentucky 40507
(electronically also)

Hon. David E. Spenard
Assistant Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601

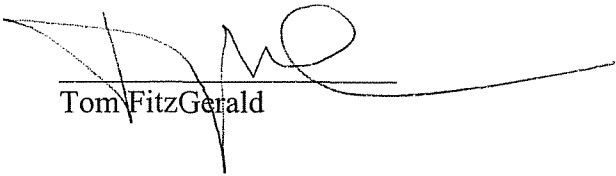
Hon. David J. Barberie
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
Lexington, Kentucky 40507

Hon. David Boehm
Boehm, Kurtz and Lowry
36 East Seventh Street, Suite 2110
Cincinnati OH 45202

Beth O'Donnell, Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

Hon. Damon R. Talley
112 North Lincoln Boulevard

Hodgenville, Kentucky 42748



Tom Fitzgerald