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AUG 27 2007

PUBLIC SERVICE
COMMISSION**VIA OVERNIGHT MAIL**

August 24, 2007

Beth A. O'Donnell, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: Case No. 2007-00134

Dear Ms. O'Donnell:

Please find enclosed the original and twelve copies each of the Responses of Kentucky Industrial Utility Customers, Inc. to Initial Request for Information of Citizens For Alternative Water Solutions, in the above-referenced matter.

By copy of this letter, all parties listed on the attached Certificate of Service been served. Please place this document of file.

Very Truly Yours,



David F. Boehm, Esq.
BOEHM, KURTZ & LOWRY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by regular U.S. mail (unless otherwise noted) to all parties on the 24th day of August, 2007.

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David F. Boehm

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

Application Of Kentucky American For :
Certificate Of Convenience And Necessity :

Case No. 2007-00034

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RESPONSES OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.
TO INITIAL REQUEST FOR INFORMATION OF
CITIZENS FOR ALTERNATIVE WATER SOLUTIONS

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.

ANSWER:

KIUC has not filed testimony in this proceeding. This is a traditional method for adopting a "final position" in a case before the KPSC.

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?

ANSWER:

See response to Data Request No. 1 above.

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?

ANSWER:

See response to Data Request No. 1 above.

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?

ANSWER:

Yes.

Data Request No. 5

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

ANSWER:

Yes.

Data Request No. 6

Has KIUC considered alternatives to the KAWC proposal?

ANSWER:

Yes.

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?

ANSWER:

KIUC members cannot manufacture goods in the absence of water.

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.

ANSWER:

This matter is proprietary and irrelevant. KIUC has not filed testimony in this case.

Data Request No. 9

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

ANSWER:

This matter is proprietary and irrelevant. KIUC has not filed testimony in this case.

Data Request No. 10

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

ANSWER:

The incentives for conservation are lower water bills.

Respectfully submitted,



David F. Boehm, Esq.

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INC.**

August 24, 2007