

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BLUEGRASS)	
WATER UTILITY OPERATING COMPANY, LLC)	
FOR A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY FOR THE)	CASE NO.
INSTALLATION OF MONITORING EQUIPMENT)	2022-00216
AND FOR A CORRESPONDING LIMITED)	
WAIVER OF DAILY INSPECTION)	
REQUIREMENTS)	

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

Bluegrass Water Utility 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 November 4, 2022. 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 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

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 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).

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 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 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. Provide any savings Bluegrass Water has realized from the installation of remote monitoring equipment at Bluegrass Water's other locations. Explain in detail how the savings were calculated, listing all factors considered.

2. Explain why Bluegrass Water purchased the earlier remote monitoring equipment from Mission Communications rather than High Tide Technologies (High Tide).

3. Refer to Bluegrass Water's response to Commission Staff's First Request for Information (Staff's First Request), Item 12. Provide the ways in which High Tide provides better and more responsive customer support.

4. Refer to Bluegrass Water's response to Staff's First Request, Item 12. Explain how High Tide is going to make the remote monitoring more valuable to the customers of Bluegrass Water.

5. Refer to Bluegrass Water's response to Staff's First Request, Item 29. State whether Bluegrass Water would commit to an in-person inspection schedule of at least three days per week for weeks when the in-person inspections do not occur on consecutive days. As an example, the Commission could require in-person inspections on Sunday, Monday, and Wednesday and remote inspections Tuesday, Thursday, Friday, and Saturday.



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DATED OCT 18 2022

cc: Parties of Record

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