

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BLUEGRASS	)	
WATER UTILITY OPERATING COMPANY, LLC	)	CASE NO.
FOR AN ADJUSTMENT OF WATER AND	)	2025-00354
SEWAGE RATES	)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY, BY AND
THROUGH THE OFFICE OF RATE INTERVENTION

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than October 12, 2026. The Commission directs the Attorney General 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 governmental agency, be accompanied by a signed certification of the preparer or the

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).

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.

The Attorney General shall make timely amendment to any prior response if the Attorney General obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which the Attorney General fails or refuses to furnish all or part of the requested information, the Attorney General 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, the Attorney General 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 the Attorney General's response to Commission Staff's First Request for Information (Staff's First Request), Item 8, Confidential Attachment 1.

- a. Explain why the net operating income impact was grossed-up only by the PSC fees and bad debt.

b. Explain why the net operating income impact gross-up did not include income taxes.

c. Provide the impact on the updated recommendations using the gross-up which includes income taxes. Provide this response in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

2. Refer to the Attorney General's response to Staff's First Request, Item 8, Confidential Attachment 1. Refer also to Case No. 2026-00099,² Exhibit JD-1 at the "SummaryWP" Tab, and Case No. 2026-00094,³ Exhibit JD-1 at the "SummaryWP" Tab.

a. Confirm that in Case No. 2026-00094, Mr. Defever's revenue requirement impact for each recommended pre-tax expense adjustment is larger than the pre-tax expense adjustment itself.

b. Confirm that in Case No. 2026-00099, Mr. Defever's revenue requirement impact for each recommended pre-tax expense adjustment is larger than the pre-tax expense adjustment itself.

c. Explain why the revenue requirement impact of each proposed adjustment is lower than the pre-tax expense adjustment in the instant proceeding. In the response, include any explanations as to how the calculation of the revenue requirement impact differed in the instant proceeding than the other above-referenced cases.

² Case No. 2026-00099, *Application of Columbia Gas of Kentucky, Inc. for an Adjustment of Rates; Approval of Depreciation Study; Approval of Tariff Revision; and Other Relief* (filed Aug. 18, 2026) Exhibit JD-1 at "SummaryWP" Tab.

³ Case No. 2026-00094, *Electronic Application of Kentucky-American Water Company for an Adjustment of Rates, Approval of System Improvement Program, and Tariff Changes* (filed Aug. 7, 2026) Exhibit JD-1 at "SummaryWP" Tab.

3. Refer to Bluegrass Water's Second Supplemental Response to Staff's Fourth Request for Information. Provide any adjustments as a result of this updated information.



Justin McNeil
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DATED SEP 29 2026

cc: Parties of Record

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