

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE)
FEASIBILITY AND ADVISABILITY OF)
KENTUCKY-AMERICAN WATER)
COMPANY'S PROPOSED SOLUTION TO) CASE NO. 2001-117
ITS WATER SUPPLY DEFICIT)

**RESPONSE OF BLUEGRASS WATER SUPPLY
CONSORTIUM TO INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY
KENTUCKY-AMERICAN WATER COMPANY**

Comes the Bluegrass Water Supply Consortium (the "BWSC") and
for its Response to the Interrogatories and Request for Production of
Documents propounded by the Kentucky-American Water Company (the
"KAWC"), states as shown on the following pages:

This 14th day of February, 2002.

Respectfully submitted,
DAMON R. TALLEY, P.S.C.

/s/ Damon R. Talley
DAMON R. TALLEY
112 NORTH LINCOLN BLVD
P. O. BOX 150
HODGENVILLE, KY 42748
(270) 358-3187 FAX (270) 358-9560

INSTRUCTION 10 CERTIFICATION

Per Instruction 10 of the Commission's May 15, 2001, procedural Order, the undersigned counsel certifies that the electronic version of this document is a true and accurate copy of the document filed in paper medium, except for the attachments which were omitted because they were too bulky to transfer to electronic medium; the electronic version of this document has been transmitted to the Commission; and the Commission and other parties have been notified by electronic mail that the electronic version of this document has been transmitted to the Commission.

DAMON R. TALLEY, P.S.C.

BY: /s/ Damon R. Talley
DAMON R. TALLEY

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing document has been served by first class U.S. Mail, postage prepaid, this 14th day of February, 2002, to the following:

Hon. Lindsey W. Ingram, Jr.
Stoll, Keenon & Park, LLP
300 West Vine Street, Suite 2100
Lexington, KY 40507-1801

Roy W. Mundy
Kentucky-American Water Co.
2300 Richmond Road
Lexington, KY 40502

Hon. David Edward Spenard
Assistant Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

Theresa L. Holmes
David J. Barberie
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
Lexington, KY 40507

Hon. Phillip J. Shepherd
307 West Main Street
P.O. Box 782
Frankfort, KY 40602

Hon. Joe F. Childers
201 West Short Street, Suite 310
Lexington, KY 40507

/s/ Damon R. Talley
DAMON R. TALLEY, P.S.C.

1. Provide a copy of the minutes of all meetings of the Consortium.

RESPONSE: A copy of all the minutes of the Consortium and its Technical Group are attached.

WITNESS: Don R. Hassall, P.E.
Assistant Executive Director
Bluegrass Area Development District

2. Provide a copy of all documents in the possession of the Consortium generated or received by it pursuant to its efforts to generate "a comprehensive, regional study of the treated water needs of Central Kentucky" as set forth in paragraph 9 of the Consortium's Motion for Intervention herein.

RESPONSE: Attached is a leaflet entitled "Questions and Answers About the Bluegrass Water Supply Consortium" dated July 2001. This leaflet provides an overview of the purposes and goals of the Consortium.

Also attached is a compilation of the existing and projected water demands for seven (7) Central Kentucky water utilities.

Other documents will be generated during the regional study. These documents will be provided to the Commission and to all parties to this proceeding as they become available.

WITNESS: Don R. Hassall, P.E.

3. Have there been any members of the Consortium who are not presently members? If so, please list them.

RESPONSE: Yes. The City of Paris is not an active participant at this time.

WITNESS: Don R. Hassall, P.E.

