

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

<b>IN THE MATTER OF:</b>	)	
	)	
<b>THE INVESTIGATION INTO THE FEASIBILITY</b>	)	<b>CASE NO. 2001-117</b>
<b>AND ADVISABILITY OF KENTUCKY- AMERICAN</b>	)	
<b>WATER COMPANY'S PROPOSED SOLUTION TO</b>	)	
<b>ITS WATER SUPPLY DEFICIT</b>	)	

**INTERROGATORIES AND REQUESTS FOR PRODUCTION**  
**OF DOCUMENTS DIRECTED TO THE**  
**ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY**

Comes Kentucky-American Water Company ("Kentucky-American"), by counsel, and in conformity with the Commission's Procedural Schedule attached to its Order of January 11, 2002, propounds the following Interrogatories and Requests for Production of Documents to the Attorney General of the Commonwealth of Kentucky ("Attorney General").

Please identify each witness for the Attorney General who will be prepared to answer questions concerning each response. These requests shall be deemed continuing and if the Attorney General receives additional information at any time subsequent hereto that is responsive to any of these requests, please file it forthwith.

1. Provide all bases for the Attorney General's objection to the Commission's Preliminary Finding on page 4 of the Objections filed January 22, 2002, "that the proposed improvements to the Kentucky River are no [sic] sufficient to adequately, dependably and safely supply the total reasonable requirements of Kentucky-American's customers under maximum consumption through the year 2020."

2. Please explain and describe in detail how the Commission's Preliminary Finding quoted in the immediate preceding data request "puts the cart before the horse."

3. Explain what is meant by the last sentence on page 5 of the Attorney General's Objections filed herein and dated January 22, 2002, and list all of the "other reasons."

4. Does the Attorney General believe that the proposed improvements to the Kentucky River are sufficient to adequately, dependably and safely supply the total reasonable requirements of Kentucky-American's customers under maximum consumption to the year 2020? If the answer is yes, please provide a description of the proposed improvements, their expected date of completion and the funding thereof. If the answer is no, provide an explanation as to why the proposed improvements are insufficient.

5. Provide a copy of the "base line" study prepared by the Fayette County Water Supply Planning Council as mentioned on page 6 of the Attorney General's Objections filed herein on January 22, 2002.

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BY:                     /s/ Lindsey W. Ingram, Jr.                    

ATTORNEYS FOR KENTUCKY-AMERICAN  
WATER COMPANY

### **CERTIFICATION**

In conformity with paragraph 10 of the Commission's Order dated May 15, 2001, this is to certify that the electronic version of this Request is a true and accurate copy of this Request filed in paper medium; that the electronic version of the filing has been transmitted to the Public Service Commission; that Kentucky-American Water Company has notified the Commission, the Attorney General, N.O.P.E., Inc., the Bluegrass Water Supply Consortium and the Lexington-Fayette Urban County Government by electronic mail that the electronic version of this Request has been transmitted to the Commission; that a copy has been served by mail upon David E. Spenard, Esq., Assistant Attorney General, Utility and Rate Intervention Division, 1024 Capital Center Drive, P.O. Box 2000, Frankfort, Kentucky 40602-2000; Theresa L. Holmes, Esq., David Barberie, Esq., Lexington-Fayette Urban County Gov't., Department of Law, 200 East Main Street, Lexington, Kentucky 40507; Phillip J. Shepherd, Esq. and Joe F. Childers, Esq., 307 West Main Street, P. O. Box 782, Frankfort, Kentucky 40602; Damon R. Talley, P.O. Box 150, 112 North Lincoln Boulevard, Hodgenville, Kentucky 42748, and hand delivered to Gerald E. Wuetcher, Esq., Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601, and that the original and three (3) copies have been filed with the Public Service Commission in paper medium, all this the 4th day of February, 2002.

STOLL, KEENON & PARK, LLP

BY:                     /s/ Lindsey W. Ingram, Jr.