

**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**  
**BLUEGRASS WATER SUPPLY CONSORTIUM**

Comes Kentucky-American Water Company, 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 Bluegrass Water Supply Consortium ("Consortium").

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

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

3. Have there been any members of the Consortium who are not presently members?

If so, please list them.

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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.