

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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

INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS DIRECTED TO THE
LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

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 Lexington-Fayette Urban County Government.

Please identify each witness for the LFUCG who will be prepared to answer questions concerning each response. These requests shall be deemed continuing and if the LFUCG 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 all information received by the Urban County Council in response to Section 2 of Resolution No. 679-99 requiring progress reports in June 2000 and in each November annually thereafter.

2. Provide a current estimate for the schedule of improvements listed in paragraphs 2 and 3 of the recommendations contained in Resolution No. 679-99 and all documents that support a change in the anticipated time of completion.

3. Describe and provide all of the information in the possession of the LFUCG that is different from the information that was in its possession at the time Resolution No. 679-99 was passed, upon which the resolution was adopted.

4. Describe and provide the "relevant facts" as that phrase is used in the first sentence of the second literary paragraph of the LFUCG's comments and objections to the Commission's Preliminary Findings of Fact dated 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.