

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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| 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
NEIGHBORS OPPOSING PIPELINE EXTRAVAGANCE, INC.

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 Neighbors Opposing Pipeline Extravagance, Inc. ("NOPE").

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

1. What population projections did the Kentucky Water Resource Research Institute use in its Kentucky River Basin Water Supply Assessment Study prepared for the Kentucky River Authority?
2. Have there been any revisions to the projections used by KWRRI?

3. Provide a copy of any information available from the Kentucky Water Resource Research Institute available to you regarding the water supply in the Kentucky River Basin other than that contained in its Assessment Study prepared for the Kentucky River Authority.

4. Provide all opinion and documentation to support the conclusion that the minimum flow requirements in the Kentucky River would not be strictly enforced by the regulatory authorities during extreme drought conditions.

5. Does NOPE believe passing flow modifications during low flows in the Kentucky River should be made as a permanent part of the solution to Central Kentucky's supply situation? If no, why not? If yes, please describe the extent the passing flows should be modified.

6. Provide the names and addresses of the "major environmental groups" that NOPE represent are supportive of a Kentucky River solution and oppose a pipeline solution to Central Kentucky's supply situation. Provide all documentation that supports the inclusion of any entity in this list.

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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.