

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

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

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S INTERROGATORIES AND REQUESTS
FOR PRODUCTION ON BLUEGRASS WATER SUPPLY CONSORTIUM**

COMES the Lexington-Fayette Urban County Government (the "LFUCG"), by counsel, in accordance with the Commission's Order dated January 11, 2002, and serves this its Interrogatories and Requests for Production on the Bluegrass Water Supply Consortium (the "Consortium"):

Interrogatories:

1. Please summarize the current activities of the Consortium with respect to issues that are relevant to this proceeding.
2. Has the Consortium undertaken a water supply study? If so, please provide the information pertaining to the contract(s) under which the work is being done, the scope of work for the study, including how the public will be involved, the total cost of the study, how and by whom the study is being funded, when the study will be completed, and the products expected.
3. What is the legal structure of the Consortium? Does it have Articles of Incorporation or Bylaws?
4. Does the fact that KAWC is not owned by a local government limit affect the structure of the Consortium? Explain.
5. Who are the current members of the Consortium? Please provide the following information for each member: number and types of customers, average day demand, peak day demand, average month demand, and peak month demand.

6. For each BWSC member please provide the latest capital investment plan or system development plan.

7. For each Consortium member that is also a utility (except for KAWC), and for each year since 1980, provide that member's infrastructure retirement and replacement rates, infrastructure retirement and replacement costs (by type of infrastructure, e.g., production, transmission, distribution, storage, and so on). Include the lengths of pipe in that member's system (by size), their investment in retiring and replacing transmission, storage and distribution infrastructure, and the amount of transmission, storage and distribution infrastructure retirement and replacement deferred each year. Please disaggregate this information for each County in which the member operates.

8. For each of the next 20 years, provide each Consortium member's infrastructure replacement cost estimates by type of infrastructure and county, and the percentage of each type of infrastructure being replaced each year. If 20-year projections are not available the most current such projections will suffice. Data for KAWC may be excluded.

9. For each Consortium member that is a water utility (except KAWC), and for each year since 1980, provide the rate at which new infrastructure is added to that members system, and its cost (by type of infrastructure, e.g., production, transmission, distribution, storage, and so on). Include the lengths of pipe added to that member's system each year (by size), investment in new transmission, storage and distribution infrastructure, and the amount of new transmission, storage and distribution infrastructure deferred each year. Please disaggregate this system for each County in which the member operates.

10. For each Consortium member that is a water utility (except KAWC), and for each year over the period 1990-2001, provide the following data: average day volume, peak day volume, average month volume, peak month volume, annual sales revenue, and average number of customers (disaggregated by class).

11. For each Consortium member that is a water utility (except KAWC), provide the latest 20-year projections for average day, peak day, average month, and peak month in million gallons per day. Also, provide the model(s) used to make these projections and note the parameter values used and supporting calculations explaining why those parameters are appropriate.

12. For each Consortium member that is a water utility (except KAWC), provide the following data for each year over the period 2002-2020: projected sales volume, growth in sales volume and growth rate in sales volume, projected revenues, growth in revenues, and growth rate in revenues, projected customers, growth in

customers, and growth rate in customers. Please provide the same information for 2001 using actual data.

13. For each Consortium member that is a water utility (except KAWC), list each application(s) filed for state or federal funding of projects. For each project, provide a detailed description, including location, specific improvements and their costs, motivation or need for the project, necessary approvals, all partners in the project, and all sources of funding (secured or proposed) for the project.

Requests for Production:

Please provide copies of the following, or in the event that such documents have already been filed with the Public Service Commission as part of this proceeding, please indicate where such documentation is referenced and filed:

1. Any documentation upon which you relied in answering any of the above Interrogatories.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN
COUNTY GOVERNMENT
Department of Law
200 East Main Street
Lexington, Kentucky 40507
(859) 258-3500

BY: /s/ Theresa L. Holmes
Theresa L. Holmes
Acting Director of Litigation

BY: /s/ David J. Barberie
David J. Barberie
Corporate Counsel

NOTICE OF FILING

Counsel gives notice (pursuant to Instruction 4(a) of the Commission's May 15, 2001 Order of Procedure) of the filing of the original and three copies of this document

have been filed by United States Mail, first class postage prepaid to Thomas M. Dorman, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40611, and by uploading the filing to the file transfer protocol site designated by the Executive Director, this 4th day of February, 2002.

/s/ David J. Barberie
ATTORNEY FOR LEXINGTON-FAYETTE
URBAN COUNTY GOVERNMENT

INSTRUCTION 10 CERTIFICATION

Per Instruction 10 of the Commission's May 15, 2001 Order of Procedure, the undersigned counsel hereby certifies that the electronic version is a true and accurate copy of the documents filed in paper, the electronic version has been transferred to the Commission, and the Commission and other parties have been notified by electronic mail that the electronic version has been transmitted to the Commission, on this the 4th day of February, 2002.

/s/ David J. Barberie
ATTORNEY FOR LEXINGTON-FAYETTE
URBAN COUNTY GOVERNMENT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion was served by first class U.S. Mail delivery, postage prepaid, on the following on this the 4th day of February 2002.

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

Lindsey Ingram, Esq.
Stoll, Keenon & Park
201 East Main Street, Suite 1000
Lexington, KY 40507-1380

Hon. David E. Spenard
Attorney General's Office
1024 Capital Center Drive
Frankfort, KY 40601-8204

Damon R. Talley, Esq.
P.O. Box 150
112 North Lincoln Blvd
Hodgenville, KY 42748
Attorney for Bluegrass Water Supply
Consortium

Phillip J. Shepherd, Esq.
307 West Main Street
P.O. Box 782
Frankfort, Kentucky 40602
Attorney for N.O.P.E., Inc.

Joe F. Childers, Esq.
201 West Short Street, Suite 310
Lexington, KY 40507
Attorney for N.O.P.E., Inc.

Gerard J. Edelen
PE Project Manager
Department of the Army Corps of Engineers
P.O. Box 59
Louisville, KY 40201-0059

Libby Jones
P.O. Box 487
Midway, KY 40347

/s/ David J. Barberie
ATTORNEY FOR LEXINGTON-FAYETTE
URBAN COUNTY GOVERNMENT

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