

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

**In the Matter of:**

<b>THE JOINT PETITION OF KENTUCKY-</b>	)	
<b>AMERICAN WATER COMPANY, THAMES</b>	)	
<b>WATER AQUA HOLDINGS GMBH, RWE</b>	)	
<b>AKTIENGESELLSCHAFT, THAMES WATER</b>	)	
<b>AQUA US HOLDINGS, INC., APOLLO</b>	)	<b>CASE NO.</b>
<b>ACQUISITION COMPANY AND AMERICAN</b>	)	<b>2002-00317</b>
<b>WATER WORKS COMPANY, INC. FOR</b>	)	
<b>APPROVAL OF A CHANGE IN CONTROL OF</b>	)	
<b>KENTUCKY-AMERICAN WATER COMPANY</b>	)	

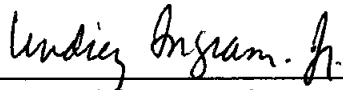
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**JOINT PETITIONERS' SUPPLEMENTAL  
RESPONSE TO DATA REQUEST**

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Joint Petitioners, Kentucky-American Water Company ("Kentucky-American"), Thames Water Aqua Holdings GmbH ("Thames Holdings"), RWE Aktiengesellschaft ("RWE"), Thames Water Aqua US Holdings, Inc. ("TWUS"), Apollo Acquisition Company ("Apollo") and American Water Works Company, Inc. ("American"), submit the attached supplemental response to Item 13 of Lexington-Fayette Urban County Government's ("LFUCG's") first Request for Information herein.

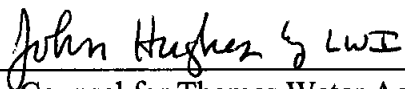
Respectfully submitted,

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(859) 231-3000

By   
Counsel for Kentucky-American  
Water Company and American  
Water Works Company, Inc.

And

John N. Hughes  
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By   
Counsel for Thames Water Aqua  
Holdings GmbH, Thames Water  
Aqua US Holdings, Inc., Apollo  
Acquisition Company and RWE AG

**CERTIFICATION**

In conformity with paragraph 13 of the Commission's Order dated September 16, 2002, herein, this is to certify that the electronic version of this pleading is a true and accurate copy of the pleading filed in paper medium; that the Petitioners have notified the Commission and the parties in this case by electronic mail on November 14, 2002, that the electronic version of this pleading has been transmitted to the Commission, and that a copy has been served by mail upon:

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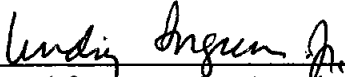
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and that the original and three copies have been filed with the Public Service Commission in paper medium on the 14<sup>th</sup> day of November 2002.

  
\_\_\_\_\_  
Counsel for Kentucky-American Water  
Company

**American Water System  
Violations of Drinking Water and Wastewater Discharge Standards**

November 9, 2002

Year	Location	Standard Violated	Type	Type of Citation	Penalty
1990	NJAWC	NJ Fish & Game	Sanitary Sewer Overflow	Penalty	\$500
1992	NJAWC	NJ DEP	Failure to obtain proper discharge permits	Penalty	\$7,125
1993	NJAWC	NJ DEP	Stream discharge of Sodium Hypochlorite	Penalty	\$500
1995	NJAWC	NJ DEP	Total Suspended Solids	Penalty	\$3,000
	NJAWC	NJ DEP	Various Discharge Limites	Penalty	\$18,000
1996	NJAWC	Monitoring	Coliform	Penalty	\$444
2000	Scranton Sewer Authority, PA Pocono County Place, PA St. Simons WPCD, GA ***	NPDES NPDES Permit	Solids Chlorine Chlorine Storage	Proposed Penalty Civil Penalty Penalty	\$4,100 \$1,250 \$5,000
2001	Southwest Utilities***	Permit	Exceeds effluent limitations	Penalty	\$3,500
2002	Hollingsworth, FL	Permit	Biosolids	Penalty	\$500

\*\*\*Violations issued under ownership of Azurix.