

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

**IN THE MATTER OF:** )  
 )  
**NOTICE OF ADJUSTMENT OF THE RATES OF** ) **CASE NO. 2004-00103**  
**KENTUCKY-AMERICAN WATER COMPANY** )  
**EFFECTIVE ON AND AFTER MAY 30, 2004** )

**KENTUCKY-AMERICAN WATER COMPANY'S**  
**REQUEST FOR INFORMATION TO THE**  
**ATTORNEY GENERAL'S WITNESSES**

Comes Kentucky-American Water Company, by counsel, and submits the following requests for information to the Attorney General's witnesses.

1. Provide a copy of all documents<sup>1</sup> Scott J. Rubin consulted which address "water budgets."
2. Identify the individual requesting, the dates requested, and the individual providing the opinions that the Low Income Discount and Economic Development Tariff are unlawful. If the opinions are in written form provide a copy.
3. Provide all the documents Scott J. Rubin utilized, generated or consulted in his study with American Water Works Association to determine how water utilities can assist low-income customers.
4. Provide a copy of the special rates that water utilities have for low-income customers known to Scott J. Rubin. Other than the AWWA Manual M1 and the study mentioned in the footnote on page 13 of the direct testimony of Scott J. Rubin, provide a copy of all

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<sup>1</sup> As used in these data requests, "document" means any and all writings or data compilations of any kind, including but not limited to letters, memoranda, reports, notes, worksheets, drafts, correspondence, agreements, books, speeches, research papers, whether handwritten, typed, printed or reproduced photostatically, photographically or electronically.

materials consulted by Scott J. Rubin in the formation of his opinion not to support the Activation Charge.

5. Provide a copy of all documents consulted or utilized by Andrea C. Crane to support her conclusions that:

a. The use of forecasted data allows the recovery of increases in investment and operating expenses that may not be recoverable if a historical test period is used,

b. Permitting the inclusion of operating expenses and the deferral of costs for later collection in a forecasted test period that are internally inconsistent, and

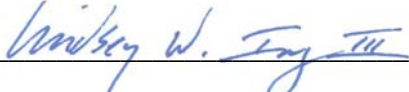
c. The significant use of deferrals in states using an historical test year for ratemaking is unusual.

6. Provide a copy of all testimony of Andrea C. Crane in water ratemaking cases in states where American Water Works Company has subsidiaries, including Pennsylvania, New Jersey, Maryland, New Mexico, Hawaii, and West Virginia.

7. Provide a copy of all documents consulted or utilized by Dr. J. Randall Woolridge to support his conclusion that "the yield on 10-year Treasury bonds has replaced the yield on 30-year Treasury bonds as the benchmark long-term Treasury rate."

8. Provide a copy of the testimony of Dr. J. Randall Woolridge in all cases involving water utilities as listed in Appendix A to his testimony.

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BY:   
ATTORNEYS FOR APPLICANT,  
KENTUCKY-AMERICAN WATER COMPANY

## CERTIFICATION

This is to certify that a true and accurate copy of the following has been electronically transmitted to the Public Service Commission on September 10, 2004; that the Public Service Commission and other parties participating by electronic means have been notified of such electronic transmission; that, on September 13, 2004, the original and one (1) copy in paper medium will be hand-delivered to the Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; and that on September 10, 2004, one (1) copy in paper medium will be delivered to the following via U.S. Mail:

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