

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 SECOND REQUEST
FOR INFORMATION TO THE ATTORNEY GENERAL'S
WITNESS DR. J. RANDALL WOOLRIDGE

Comes Kentucky-American Water Company, by counsel, and submits the following requests for information to the Attorney General's witness Dr. J. Randall Woodridge.

1. Regarding Exhibit (JRW-3), p. 1 of 1, please provide the C. A. Turner Utility Reports, August 2004, that contain the data described on the exhibit.

2. Please provide fully functional electronic work papers for the following schedules presented in to Dr. Woolridge's direct testimony. These work papers should be in a format that provides the capability to review all data inputs and calculations that are the basis for the results displayed in the exhibits as filed. In addition, where requested, please provide all source documents underlying the data and results displayed in the exhibits.

(a) Exhibit (JRW-5), pp. 1, 2, and 3.

(b) Exhibit (JRW-5), p. 1 of 5. Also provide all information on how the index of long-term A-rated public utility bonds is constructed, including the specific bonds included in the index and the average maturity of the bonds in the index.

(c) Exhibit (JRW-7), p. 2 of 5. Also provide source documents for data shown on the exhibit.

(d) Exhibit (JRW-7) p. 3 of 5. Please include source data underlying all the results shown in the exhibit.

(e) Page 57. Please provide the data and source documents underlying the graph titled, "Actual Versus Forecasted 5-Year EPS Growth for the S&P 500 2984 - 2003."

3. Exhibit (JRW-8), p. 2 of 5. Please provide a copy of the cited paper, "Equity Risk Premium: Expectations Great and Small," Working Paper (version 3.0), Automobile Insurers Bureau of Massachusetts, August 28, 2003.

4. Footnote 2, p. 6. Please provide a copy of the cited reference.

5. Footnote 3, p. 12. Please provide a copy of the cited reference.

6. Page 52. Please provide C. A. Turner Utility Reports August 2004 that verify the percent of revenues from gas for Dr. Vander Weide's LDC group.

7. Footnote 20, p. 54. Please provide a copy of the cited reference.

8. Page 56. Please provide a copy of the source documents underlying the data displayed in the graph titled, "Analysts Forecasted 5-Year EPS Growth for the S&P 500, 1985 – 2003.

9. Footnote 24, page 68. Please provide a copy of the cited reference.

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ATTORNEYS FOR APPLICANT,
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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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