

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Adjustment of Rates of Kentucky- )  
American Water Company )

Case No. 2004-00103

ATTORNEY GENERAL'S RESPONSE TO  
COMMISSION STAFF HEARING DATA REQUEST

The Office of the Attorney General tenders its response to the Commission Staff's data request to Dr. J. Randall Woolridge made during its examination of Dr. Woolridge at the evidentiary hearing.

Respectfully submitted,

GREGORY D. STUMBO  
ATTORNEY GENERAL

*David Edward Spenard*  
Dennis G. Howard II  
David Edward Spenard  
Assistant Attorneys General

1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601-8204  
502-696-5453 (FAX) 502-573-8315

*Submission of Filing in Paper Medium*

Per Instructions 3 and 13 of the Commission's 27 May 2004 Order, Counsel submits for filing, by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601, the original and one copy in paper medium of the document. 23 November 2004 is the date for the filing in paper medium.

David Edward Speman  
Assistant Attorney General

*Certificate of Service*

Per Instructions 4, 8 (d), and 12 of the May 27<sup>th</sup> Order, Counsel certifies service of a true and correct photocopy of the document by mailing the photocopies, first class postage prepaid, to the other parties of record on 22 November 2004.

The following are the other parties of record: David Jeffrey Barberie, Leslye M. Bowman, Lexington-Fayette Urban County Government, Department of Law, 200 East Main Street, Lexington, Kentucky 40507; Coleman D. Bush, Kentucky-American Water Company, 2300 Richmond Road, Lexington, Kentucky 40502; Joe F. Childers, 201 West Short Street, Suite 310, Lexington, Kentucky 40507; Roy L. Ferrell, West Virginia American Water Company, 1600 Pennsylvania Avenue, Charleston, West Virginia 25302; Lindsey W. Ingram III, Stoll, Keenon & Park, LLP, 300 West Vine Street, Suite 2100, Lexington, Kentucky 40507-1801; Lindsey W. Ingram, Jr., Stoll, Keenon & Park, LLP, 300 West Vine

Street, Suite 2100, Lexington, Kentucky 40507-1801; Michael A. Miller, West Virginia American Water Company, 1600 Pennsylvania Avenue, Charleston, West Virginia, 25302; Jon Parker, 201 W. Short Street, Suite 310, Lexington, Kentucky 40507; Bluegrass FLOW, Inc., c/o Foster Ockerman, Jr., 200 N. Upper Street, Lexington, Kentucky 40507; and Roy W. Mundy II, Kentucky-American Water Company 2300 Richmond Road, Lexington, Kentucky 40502.

David Earl Spence  
Assistant Attorney General

*Certification Regarding Electronic Filing*

Counsel certifies that he has (per Instructions 3 and 8 (b) of the May 27<sup>th</sup> Order) submitted one copy of the document in electronic medium. Pursuant to Instructions 8 (a) and 8 (c) of the May 27<sup>th</sup> Order, he certifies that the electronic version of the filing is a true and accurate copy of the document filed in paper medium and that he has, by electronic mail, notified the Commission and the other parties that the electronic version of the filing has been transmitted to the Commission. (See attached) 22 November 2004 is the date of filing in electronic medium.

David Earl Spence  
Assistant Attorney General

**Kentucky-American Water Company**

**Case No. 2004-00103**

Information Request Response to Commission Staff

Respondent: OAG Witness Dr. J. Randall Woolridge

With reference to PSC-I-17 (OAG to PSC 1 – 17) – Attachment PSC-I-17A. At page 17 of 68, the '#VALUE!' (below the figure 12.528%) in the spreadsheet is a missing figure for 'Return on Equity' in 1989 for SJW, and the '#VALUE!' below is a calculation of the average 'Return on Equity' for 1989 for the large company group. Neither data from 1989 or the 'Return on Equity' were used in determining growth rates, and therefore this result had no impact on the growth rate analysis.

With reference to PSC-I-17 (OAG to PSC 1 – 17) – Attachment PSC-I-17A. At page 17 of 68, the first '#VALUE!' (below the figure -1.931) in the spreadsheet is a missing figure for 'Interest Coverage' in 1989 for WTR, and the second '#VALUE!' is a calculation of the average 'Interest Coverage' for 1989 for the large company group. Neither data from 1989 or the 'Interest Coverage' were used in determining growth rates, and therefore this result had no impact on the growth rate analysis.

With reference to PSC-I-17 (OAG to PSC 1 – 17) – Attachment PSC-I-17A. At page 32 of 68, all cells indicated by the term '#VALUE!' refer to 'Retention Rate' data for companies in the small water company group. No 'Retention Rate' data were employed in determining growth rates, and therefore this result had no impact on the growth rate analysis.

With reference to PSC-I-17 (OAG to PSC 1 – 17) – Attachment PSC-I-17A. At page 40 of 68, all cells indicated by the term '#VALUE!' refer to 'Retention Rate' data for companies in the small water company group. No 'Retention Rate' data were employed in determining growth rates, and therefore this result had no impact on the growth rate analysis.