

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

IN THE MATTER OF:)	
)	
NOTICE OF ADJUSTMENT OF THE RATES OF)	CASE NO. 2007-00143
KENTUCKY-AMERICAN WATER COMPANY)	
EFFECTIVE ON AND AFTER MAY 30, 2007)	

**KENTUCKY-AMERICAN WATER COMPANY'S
DATA REQUESTS TO THE ATTORNEY GENERAL**

In accordance with the Public Service Commission's ("Commission") May 2 & 11, 2007 Orders, Kentucky-American Water Company ("KAW") propounds the following data requests upon the Attorney General. The Attorney General shall respond to these requests in accordance with the provisions of the Commission's May 2 & 11, 2007 Orders and the instructions set forth below.

INSTRUCTIONS

1. In producing documents and things responsive to these requests, you shall respond in accordance with the requirements set forth in the Commission's May 2 & 11, 2007 Orders and the production shall be organized and labeled to correspond with the data requests to which they are responsive, regardless of whether these documents and things are possessed directly by you or by your present or past agents, employees, companies, licensees, representatives, investigators, or attorneys.

2. If the attorney-client privilege or work product immunity is asserted as to any document or thing, or if any document or thing is not produced in full, produce the document or thing to the extent the request for production is not objected to, and, in so doing, state the following:

- (a) the specific ground(s) for not producing the document or thing in full;
- (b) the basis for such a claim of privilege or immunity and the facts supporting that basis; and
- (c) fully identify the information or material contained within the document or thing for which such privilege or immunity is asserted, including as applicable, the name of any document or thing; its date; the name, address and job title of each author or other person involved in its preparation, each addressee and each person to whom a copy of the document or thing has been sent or received; and the general nature of the document or thing (e.g., memoranda, letter).

3. Where an objection is made to a request, state all grounds upon which your objection is based.

4. If, after exercising due diligence, you are unable to determine the existence of any documents or things falling within a specific request, you shall so state in your written response.

5. With respect to each of the following requests, you shall identify and/or produce all documents which are known to you or which can be located or discovered by you through diligent effort on your part, including, but not limited to, all documents which are in your business, personnel, and/or personal files or those of your present or past employees or contained or stored within a computer in your possession or those of your present or past representatives, attorneys, or accountants, or accessible to you or your present and past employees, or its representatives, attorneys, or accountants.

6. Whenever used herein, the singular shall be deemed to include the plural and the plural shall be deemed to include the singular and the disjunctive shall be deemed to include the

conjunctive and the conjunctive shall be deemed to include the disjunctive so as to elicit all information potentially responsive to the request for production and all of its context.

REQUEST

1. Reference Dr. Woolridge's testimony at pp. 61 - 66. Please provide in spreadsheet format with all formulae intact all data that support Dr. Woolridge's studies and analyses regarding analysts' growth forecasts, including all data underlying the following tables displayed on pp. 62, 64, and 66, respectively:

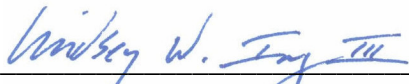
- a. "Analysts' Forecasted 3-5-Year Forecasted Versus Actual EPS Growth Rates 1984-1999";
- b. "Mean Analysts' 3-5- Year Forecasted EPS Growth Rates 1985 – 2004"; and
- c. "Analysts' Forecasted 3-5-Year Forecasted Versus Actual EPS Growth Rates Electric Utility Group 1990 – 2006."

Respectfully submitted,

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and

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BY:  _____
Lindsey W. Ingram, Jr.
Lindsey W. Ingram III

Attorneys for Kentucky-American Water Company

CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of Kentucky-American Water Company's August 13, 2007 Data Requests to the Attorney General have been electronically transmitted to the Public Service Commission on August 13, 2007; that the Public Service Commission and other parties participating by electronic means have been notified of such electronic transmission; that, on August 14, 2007, 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 August 13, 2007, one (1) copy in paper medium will be served upon the following via U.S. Mail:

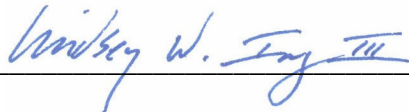
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