## Commonwealth of Kentucky Before the Public Service Commission

In the Matter of: NOTICE OF ADJUSTMENT OF THE RATES OF KENTUCKY-AMERICAN WATER COMPANY EFFECTIVE ON AND AFTER MAY 30, 2007

) Case No. 2007-00143

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

The Attorney General submits his Response to Kentucky-American Water

Company's Data Requests to the Attorney General.

Respectfully submitted,

GREGORY D. STUMBO ATTORNEY GENERAL کست کیمک David Edward Spenard Dennis G. Howard II Assistant Attorneys General 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204 T 502 696-5457 F 502-573-8315

#### Notice of Electronic Filing, Filing, and Certificate of Service

Counsel certifies that, pursuant to Paragraphs 2, 4, and 6 of the Commission's 2 May 2007 Order of procedure, the submission of a true and accurate copy of this document in electronic format by uploading the document to the Commission's Web Application Portal on this 27<sup>th</sup> day of August 2007. Counsel, pursuant to Paragraph 2 of the Commission's May 2<sup>nd</sup> Order, provides notice of the filing of the original and one photocopy the Attorney General's Response by hand-delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601 on 28 August 2007.

Pursuant to 807 KAR 5:001, Section 3(7) and Paragraphs 2 and 6(d) of the Commission's May 2<sup>nd</sup> Order and Paragraph 4 of the Commission's 11 May 2007 Order granting intervention, the document was served by mailing a true and correct photocopy of the same, first class postage prepaid, to the following:

Leslye M. Bowman David Jeffrey Barberie Lexington-Fayette Urban County Government, Department Of Law 200 East Main Street Lexington, Kentucky 40507 (counsel for LFUCG);

David F Boehm Boehm, Kurtz & Lowry 36 East Seventh Street 2110 CBLD Building Cincinnati, OH 45202 (counsel for KIUC);

Lindsey W. Ingram, Jr.

Lindsey W. Ingram, III Stoll Keenon Ogden PLLC 300 West Vine Street Suite 2100 Lexington, KY 40507-1801 (counsel for Kentucky-American Water); and

Joe F. Childers Getty & Childers, PLLC 1900 Lexington Financial Center 250 West Main Street Lexington, Kentucky 40507 (counsel for Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.).

Per Paragraph 6 of the Commission's May 2<sup>nd</sup> Order, Counsel certifies that the electronic version of this document is a true and accurate copy of the document filed in paper medium, the electronic version of the filing has been transmitted to the Commission, and the parties have been notified of the filing of the electronic transmission to the Commission. Service was on this 27<sup>th</sup> day of August 2007.

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Assistant Attorney General

## Case No. 2007-00143 Kentucky-American Water Company's Data Requests To The Attorney General

### Response of Dr. J. Randall Woolridge

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."

Response: The requested information is provided on the enclosed CD.