

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

IN THE MATTER OF:)
)
THE APPLICATION OF KENTUCKY-AMERICAN) CASE NO. 2010-00036
WATER COMPANY FOR AN ADJUSTMENT OF)
RATES ON AND AFTER MARCH 28, 2010)

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

In accordance with the Public Service Commission's ("Commission") March 17, 2010 Order, Kentucky-American Water Company ("KAW") propounds the following data requests upon the LFUCG. The LFUCG shall respond to these requests in accordance with the provisions of the Commission's March 17, 2010 Order and the instructions set forth below.

INSTRUCTIONS

1. In producing documents and things responsive to these requests, the LFUCG ("you") shall respond in accordance with the requirements set forth in the Commission's March 17, 2010 Order 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.

REQUESTS

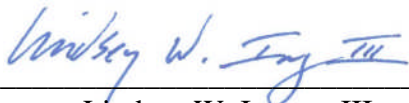
1. Please provide all Excel files prepared, relied on or used by Mr. Baudino in the preparation of his testimony, including but not limited to, Excel files related to his Exhibits 2, 4, 5, 6, 7, 8 and 9.
2. At page 44 of Mr. Baudino's testimony, he states "LFUCG reserves the right to include other revenue requirement adjustments that may be proposed by other parties in this proceeding." Since that statement was made, the Attorney General's witness Mr. Smith has proposed numerous revenue requirement adjustments itemized as C-1 through C-18 in Mr. Smith's written testimony and further quantified as items C-1 through C-18 at pages 1-2 of Mr. Smith's Schedule C.1. For each of those 18 proposed adjustments, please:
 - A. state whether the LFUCG agrees or disagrees with the proposed adjustment;
 - B. if the LFUCG agrees, provide a complete description of why it agrees;
 - C. if the LFUCG disagrees, provide a complete description of why it disagrees;
 - D. if the LFUCG agrees with only part of a particular proposed adjustment, quantify in dollars the amount with which it agrees and explain why; and
 - E. if the LFUCG disagrees with only part of a particular proposed adjustment, quantify in dollars the amount with which it disagrees and explain why.
3. Please provide a copy of all documents including but not limited to electronic mail, electronic files, and documents in paper medium in the possession of the LFUCG, its Council Members, the LFUCG's Mayor's office, or the LFUCG's Vice-Mayor's office that relate in any way to this rate case and/or KAW's requested rate increase. This request is limited to documents generated from January 1, 2010 to the date of LFUCG's response to this request.
4. Please provide a copy of all correspondence to or from anyone affiliated with the LFUCG and Mr. Baudino concerning this rate case.
5. Please provide a copy of all correspondence to or from anyone affiliated with the LFUCG and the Attorney General's office concerning this rate case.

Respectfully submitted,

A.W. Turner, Jr., General Counsel
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and

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BY: 

Lindsey W. Ingram III
Attorneys for Kentucky-American Water Company

CERTIFICATE

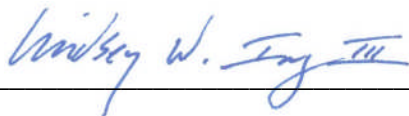
In accordance with Ordering Paragraph No. 6 of the Commission's February 16, 2010 Order, this is to certify that Kentucky-American Water Company's June 25, 2010 electronic filing is a true and accurate copy of the documents to be filed in paper medium; that the electronic filing has been transmitted to the Commission on June 25, 2010; that an original and one copy of the filing will be delivered to the Commission on June 28, 2010; and, that, on June 28, 2010, electronic mail notification of the electronic filing will be provided to the Commission and the following:

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By 

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