COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY AMERICAN)	
WATER COMPANY FOR A CERTIFICATE OF)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY)	2012-00096
AUTHORIZING THE CONSTRUCTION OF THE)	
NORTHERN DIVISION CONNECTION)	

LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S SUPPLEMENTAL REQUESTS FOR INFORMATION

Comes now the Lexington-Fayette Urban County Government (the "LFUCG"), by counsel and pursuant to the Public Service Commission's Scheduling Order of June 19, 2012, and submits its Supplemental Requests for Information to the Kentucky-American Water Company ("KAW") to be answered in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the company witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from counsel for the LFUCG.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for the LFUCG as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

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WHEREFORE, the Lexington-Fayette Urban County Government submits these Supplemental Requests for Information.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT Department of Law 200 East Main Street Lexington, Kentucky 40507 (859) 258-3500

BY:

Javid & Barbere

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NOTICE AND CERTIFICATION

In accordance with Ordering Paragraph No. 10 of the Commission's March 20, 2012 Order, this is to certify that Lexington-Fayette Urban County Government's August 6, 2012 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on August 6, 2012; that there are currently no parties that the Commissions has excused from participating by electronic means in this proceeding; and that an original and one copy of the filing in paper medium are being mailed to the Commission on August 6, 2012.

Vavid & Barberne

BY:

David J. Barberie

SUPPLEMENTAL REQUESTS FOR INFORMATION

1. Please explain in detail how this proposal impacts KAW's Fayette County or Central division customers.

2. Does this proposed project benefit KAW's Fayette County or Central division customers in any way? Explain in detail.

3. What assurances, if any, will be provided KAW's Fayette County or Central division customers that the proposal will not impact them in the event of a drought or water shortage?

4. Has KAW considered crediting or otherwise compensating KAW's Fayette County or Central division customers for the Northern divison's use of the water from the treatment plant as part of its proposal? Why or why not?

5. In the event that the proposal is approved, what will be the future rate impact to KAW's Fayette County or Central division customers?

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