

Commonwealth of Kentucky
Before the Public Service Commission

In the Matter of:

APPLICATION OF KENTUCKY-AMERICAN)
WATER COMPANY FOR AN ADJUSTMENT OF) Case No. 2012-00520
RATES SUPPORTED BY A FULLY FORECASTED)
TEST YEAR)

ATTORNEY GENERAL'S
READ1ST FOR HIS
PRE-FILED DIRECT TESTIMONY
And
MOTION FOR ENLARGEMENT OF TIME/DEVIATION
TO FILE SUPPLEMENTAL TESTIMONY

The Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, submits his Pre-Filed Direct Testimony. In accordance with 807 KAR 5:001 Section 8(5)(a) and Numbered Paragraph 5 of the Commission's 17 December 2012 Order of procedure, the Attorney General provides his general description of the filing. The filing contains the testimony through the following witnesses that are jointly-sponsored by the Attorney General and the Lexington-Fayette Urban County Government. The filing also contains a Motion for Enlargement of Time or Deviation from the Order of procedure to file supplemental testimony.

I. Pre-Filed Direct Testimony

The filing contains the pre-filed Direct Testimony of the following three (3) witnesses:

Mr. Stephen M. Rackers;

Dr. J. Randall Woolridge; and

Mr. Brian Kalcic.

The Pre-Filed Direct Testimony includes schedules, exhibits, and appendices in both PDF format as well as in Excel files. Pursuant to 807 KAR 8(5)((a) 1 and 3 and Numbered Paragraph 5 of the December 17th Order, the Attorney General notes the following.

With regard to the testimony of Mr. Stephen M. Rackers, the direct testimony and workpapers/supporting schedules (referenced in his testimony) filed in PDF format are true representations of the original documents. With regard to the Excel file containing the workpapers/supporting schedules, the Excel file may contain additional supporting or secondary entries that do not appear in the print version.

With regard to Dr. J. Randall Woolridge, the direct testimony, appendices, and supporting schedules in PDF format are true representations of the original documents. With regard to the three (3) Excel files, each file may contain

additional supporting or secondary entries that do not appear in the print versions.

With regard to the testimony of Mr. Brian Kalcic, the direct testimony, schedules, and appendix filed in PDF format are true representations of the original documents. The filing also contains an Excel file of the schedules and an additional, 2nd Excel file relating to KAW_R_PSCDR1_NUM14_attachmentCOSS pres rates. In that the latter file is in the nature of a supporting workpaper rather than a schedule, a print out of the file is not being supplied. For the Excel file of the schedules, the file contains additional comments and notes regarding the construction and support of the schedules that do not appear in the print version but for the convenience of the Commission and the parties have been left in the Excel files.

Pursuant to 807 KAR 5:001 Section 8(7) and Numbered Paragraph 10 of the Commission's December 17th Order, undersigned certifies that the electronic versions in PDF are true and accurate copies of each document filed in paper medium; that the electronic version of the filing has been transmitted to the Commission; and (in that there are no parties that have been excused by the Commission from participation by electronic means) the filing is in compliance with 807 KAR 5:001 Section 8(7)(c) and Numbered Paragraph 10(c) of the Order of procedure.

II. Motion for Enlargement of Time; Deviation from Procedural Schedule.

The Attorney General respectfully moves for an enlargement of time or otherwise a deviation from the schedule in the Order of procedure permitting the Attorney General to file supplemental testimony through Mr. Stephen M. Rackers on or before Monday, 8 April 2013. In support of this motion, the Attorney General notes that his Office, the Lexington-Fayette Urban County Government, and the Applicant, Kentucky-American Water Company, have been discussing the Application and Responses to requests for information, and these discussions encourage and permit a simplification of issues. During these discussions, it was determined that relevant material was inadvertently omitted from a filing. This omission was promptly addressed.

With regard to the material, the Attorney General seeks permission to file supplemental testimony addressing the Business Transformation issue. If there is a supplemental filing that necessitates revisions to other documents and recommendations, then such will be filed as well. The Attorney General does not seek revisions of any of the remaining dates on the procedural schedule, and the extension request corresponds to a modest amount of time for a supplemental filing. Undersigned has discussed this matter with Counsel for the Applicant, and Counsel for KAW indicates (and authorizes the Attorney General to convey) that the Applicant has no problem with an extension of time until Monday, April

8th for a supplement to the testimony of Stephen M. Rackers.

WHEREFORE, the Attorney General submits his Read1st for the electronic filing and his Motion for an Enlargement of Time or Deviation permitting the filing of supplemental testimony on or before Monday, 8 April 2013.

Respectfully submitted,

JACK CONWAY
ATTORNEY GENERAL

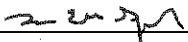
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Notice of Filing, Certifications, and Notice of Service

Undersigned counsel provides the following notice with regard to the filing of this material, certifications for the filing, and notice of the service of information to the other parties of record. Pursuant to the Commission's 17 December 2012 Order of procedure, the Attorney General will file the original version and one copy in paper medium on or before 5 April 2013, the 2nd business day following the electronic filing.

Per 17 December 2013 Order of procedure, undersigned counsel certifies that the electronic version is a true and accurate copy of the material filed in paper medium, the electronic version has been transmitted to the Commission. With regard to the electronic filing, in conformity with 807 KAR 5:001 and the Commission's December 17th Order of procedure, the Attorney General has submitted his electronic copies of the information by uploading the material to the Kentucky Public Service Commission.

The electronic filing took place on 3 April 2013.



Assistant Attorney General