

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF WATER SERVICE )  
CORPORATION OF KENTUCKY FOR AN ) Case No. 2010-00237  
ADJUSTMENT OF RATES )

**ATTORNEY GENERAL'S  
SECOND REQUESTS FOR INFORMATION TO  
WATER SERVICE CORPORATION OF KENTUCKY**

The Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, submits this Second Request for Information to Water Service Corporation of Kentucky ("WSCK" or "the company") to be answered by the date specified in the Commission's Order of Procedure, and 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, unless otherwise indicated.
2. Please identify the witness who will be prepared to answer questions concerning each request.
3. Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for WSCK with a Word or real text format version of these data requests, upon request.

4. 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.

5. If any request appears confusing, please request clarification directly from the Office of Attorney General.

6. 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.

7. If the Applicant has an objection to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General 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, please 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.

10. As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms include all information regardless of the medium or media in which they are recorded (including electronic media and e-mail), in any written, graphic or other tangible form including, but not necessarily limited to: all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all

research and development (R&D) materials; newspaper clippings and press releases; time cards / records, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

11. 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.

12. In the event any document called for has been destroyed or transferred beyond the control of the company:

(a) please identify: (i) the person by whom it was destroyed and/or transferred; (ii) the transferee; and (iii) the person authorizing the destruction or transfer; and

(b) state: (i) the time, place, and method of destruction or transfer; and, (ii) the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

13. Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.

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 12 December 2013 Order of procedure and 807 KAR 5:001 Section 8, the Attorney General will file the original version in paper medium on or before 7 January 2014, the 2<sup>nd</sup> business day following the electronic filing.

Per 18 October 2013 Order of procedure and 807 KAR 5:001 Section 8, 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 Section 8 and the Commission's 18 October 2013 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 Attorney General is aware of no party for whom a paper copy is required to be mailed or who has been excused by the Commission from participation by electronic means.

The electronic filing took place on 3 January 2014.

A handwritten signature in black ink, appearing to read "Gregory T. Dutton", with a long horizontal line extending to the right.

Gregory T. Dutton  
Assistant Attorney General