

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Application of Water Service Corporation)
of Kentucky for a General Adjustment)
in Existing Rates) Case No. 2013-00237

**WATER SERVICE CORPORATION OF KENTUCKY'S
REQUEST FOR INFORMATION TO THE ATTORNEY GENERAL**

In accordance with the Public Service Commission's ("Commission") December 13, 2013 Order, Water Service Corporation of Kentucky propounds the following data requests upon the Attorney General. The Attorney General shall respond to these requests in accordance with the provisions of the Commission's December 13, 2013 Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. 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.

2. Where an objection is made to a request, state all grounds upon which your objection is based.

3. The AG shall make timely amendment to any prior response if he obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect.

REQUESTS

1. With respect to the testimony of Andrea C. Crane, please provide the following:
 - a. Provide a copy of each written testimony that Ms. Crane has submitted since January 1, 2011 in all utility commissions, in which the topic of her testimony related in part or in whole to revenue requirements. Each testimony should be submitted in a pdf file with OCR so that it is searchable;
 - b. Provide a copy of each written testimony that Ms. Crane has submitted in matters related to water utilities since January 1, 2004, in all utility commissions, in which the topic of her testimony related in part or in whole to revenue requirements. Each testimony should be submitted in a pdf file with OCR so that it is searchable;
 - c. Provide a copy of the corresponding final order for the docket (and if there is no final order, indicate the procedural status of the proceeding) from the cases in which Ms. Crane has provided testimony as identified in requests (a) and (b) above; and
 - d. Please provide a copy of Ms. Crane's workpapers for her testimony in this matter.

2. Refer to page 10, lines 17-19 of Ms. Crane's testimony.

a. Identify all Public Service Commission of Kentucky decisions to which Ms. Crane refers in making her conclusions and opinions;

b. Identify all regulatory policies to which Ms. Crane refers in making her conclusions and opinions, and identify the rate cases in which those policies were adopted; and

c. To the extent that the rate cases identified in (b) above were not from Kentucky, provide a copy of the final order from each respective case and all other orders from those cases discussing the referenced regulatory policies.

Respectfully submitted,



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