

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY-AMERICAN
WATER COMPANY FOR AN ADJUSTMENT OF
RATES

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CASE NO. 2015-00418

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S SUPPLEMENTAL REQUESTS FOR INFORMATION
TO THE KENTUCKY-AMERICAN WATER COMPANY**

Comes now the Lexington-Fayette Urban County Government ("LFUCG" or "Lexington"), by counsel and pursuant to the Public Service Commission's Scheduling Order of February 22, 2016 and submits its Supplemental Requests for Information to the Kentucky-American Water Company ("KAWC") to be answered as follows:

(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.

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

Respectfully submitted,

LEXINGTON-FAYETTE URBAN
COUNTY GOVERNMENT
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BY:



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FILING NOTICE AND CERTIFICATE

I hereby certify that the foregoing is a true and accurate copy of the document(s) to be filed in paper medium with the Public Service Commission (which include a cover letter serving as the required Read1st document); that the electronic submission of these documents to the Commission was performed on April 11, 2016; that copies of these documents were mailed via first class U.S. Mail, postage prepaid, to the Kentucky Public Service Commission on April 11, 2016; and that there are currently no parties that have been excused from participation by electronic service.

BY:



Andrea C. Brown, Esq.

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

1. Please provide a copy of any and all agreements or tariffs not previously provided regarding public fire hydrants or the payment of hydrant fees between KAWC and the following jurisdictions:

- A. City of Georgetown (relating to the hydrant fee charged pursuant to Section 7-2 of the Georgetown Code of Ordinances); and
- B. Municipalities or localities served in the State of Illinois; and
- C. Municipalities or localities served in the State of Indiana.

2. Does the City of Georgetown's hydrant fee apply to all KAWC customer classes in Georgetown?

3. Please provide a list of all KAWC customer classes in Fayette County with a breakdown of the number of customers per class. If you do not have a definitive list, please provide your best estimate of these numbers.