

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:** )  
 )  
**APPLICATION OF KENTUCKY-AMERICAN )**  
**WATER COMPANY FOR AN ADJUSTMENT )** **CASE NO. 2015-00418**  
**OF RATES** )  
 )

**OBJECTION TO AG INITIAL REQUEST FOR INFORMATION 22**

In accordance with the deadline set forth in the Commission’s February 22, 2016 Order, Kentucky-American Water Company (“KAWC”), by counsel, submits this objection to Item No. 22 of the Office of the Attorney General’s (“OAG”) Initial Request for Information.

The request asks for “the authorized and earned return on common equity for Kentucky American Water and the other operating utility subsidiaries of American Water over the past five years.” The request further asks for all associated work papers and source documents. While KAWC has no objection to providing its authorized and earned returns over the last five years, as well as the authorized returns for American Water’s other operating utility subsidiaries, the *earned* returns of the other operating utility subsidiaries has no relevance as to what *authorized* return should be ordered in this case. KAWC has been unable to informally resolve this dispute.

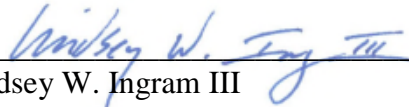
Date: March 18, 2016

Respectfully submitted,

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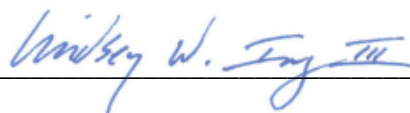
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By:   
Lindsey W. Ingram III  
Monica H. Braun

**CERTIFICATE**

This certifies that Kentucky-American Water Company's electronic filing is a true and accurate copy of the documents to be filed in paper medium with the exception of documents for which confidential treatment is sought; that the electronic filing has been transmitted to the Commission on March 18, 2016; that a paper copy of the filing will be delivered to the Commission within two business days of the electronic filing; and that no party has been excused from participation by electronic means.

STOLL KEENON OGDEN PLLC

By: 

Attorneys for Kentucky-American Water Company