

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

<i>Electronic</i> Proposed Acquisition by Bluegrass)	
Water Utility Operating Company, LLC <u>and</u>)	
the Transfer of Ownership and Control of)	
Assets by: P.R. Wastewater Management, Inc.;)	No. 2019-00104
Marshall County Environmental Services LLC;)	
LH Treatment Company, LLC; Kingswood)	
Development, Inc.; Airview Utilities, LLC;)	
Brocklyn Utilities, LLC; Fox Run Utilities,)	
LLC; and, Lake Columbia Utilities, Inc.)	

Bluegrass Water’s Motion for Informal Conference

Bluegrass Water Utility Operating Company, LLC (“Bluegrass Water”), whose proposed acquisition of ownership and control of utility assets was conditionally approved in the Commission’s Order entered August 14, 2019, hereby moves for an informal conference in this matter, to be held on September 3 or 4, 2019. In support of this motion, Bluegrass Water states as follows:

1. The 8/14/19 Order conditionally approved the proposed asset transfers to, and acquisitions by, Bluegrass Water subject to the acceptance of the 19 numbered conditions set forth in the Appendix to the Order. Bluegrass Water, its affiliate-owners, and Josiah Cox, in his capacity as President of Central States Water Resources, Inc. (“CSWR”), intend to acknowledge and undertake the required commitments, in accordance with ordering ¶2 (p.25) of the 8/14/19 Order.

2. Bluegrass Water intends to fulfill and discharge the commitments listed in the Appendix to the 8/14/19 Order. An informal conference with the Commission Staff (and possible participation by the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“AG”)), prior to any closing on a transferring utility’s assets, will

assist Bluegrass Water in implementing and complying with those commitments, as well as its other obligations, from the first moment that it operates a jurisdictional utility.

3. Bluegrass Waters suggests that the informal conference would not take more than two (2) hours. Although it requests that the informal conference be in-person at the Commission offices in Frankfort, there should be provision for participation by telephone.

4. Bluegrass Water representatives would be available to participate in an informal conference during the workday on September 3 or 4, 2019, morning or afternoon. The AG's representative for this case (Kent A. Chandler) has indicated that he would be available to participate in an informal conference during those time periods. Bluegrass Water asks for an informal conference to be scheduled during that two-day period if possible; if not possible, it asks for an informal conference the following week (September 9-13, 2019) on a day and time feasible for key participants for Bluegrass Water.

WHEREFORE, Bluegrass Water respectfully requests scheduling of an informal conference in this matter, to be held if possible on September 3 or 4, 2019.

Respectfully submitted,

/s/ Katherine K. Yunker

Katherine K. Yunker
kyunker@mcbayerfirm.com

Kathryn A. Eckert
keckert@mcbayerfirm.com

MCBRAYER PLLC
201 East Main Street; Suite 900
Lexington, KY 40507-1310
859-231-8780
fax: 859-231-1175

*Attorneys for Applicant Bluegrass Water
Utility Operating Company, LLC*