

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PROPOSED ACQUISITION BY)	
BLUEGRASS WATER UTILITY OPERATING)	
COMPANY, LLC AND THE TRANSFER OF)	
OWNERSHIP AND CONTROL OF ASSETS BY P.R.)	
WASTEWATER MANAGEMENT, INC., MARSHALL)	CASE NO.
COUNTY ENVIRONMENTAL SERVICES, LLC, LH)	2019-00104
TREATMENT COMPANY, LLC, KINGSWOOD)	
DEVELOPMENT, INC., AIRVIEW UTILITIES, LLC,)	
BROCKLYN UTILITIES, LLC, FOX RUN UTILITIES)	
LLC, AND LAKE COLUMBIA UTILITIES, INC.)	

ATTORNEY GENERAL'S POST-HEARING DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), and submits these Post-Hearing Data Requests to the above-noted applicants in this matter (hereinafter “Joint Applicants”) to be answered by the date required by Commission Order, responding either jointly or individually 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 requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (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) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification

of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) 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.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the Joint Applicants have objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(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 shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, 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, 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 regardless of the media or format in which they are stored, 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, 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.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

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1. Refer to Attorney General hearing exhibits 5-9, the annual reports of Brocklyn Utilities (2018), Fox Run Utilities (2018), Lake Columbia Utilities (2016 and 2017) and Airview Utilities (2018). Provide the amount paid to the entity or person who served as the operator during that year (e.g. Mike Gray, Elliot Turner, Shawn Ford, etc.) for the year of the annual report and the amount paid to the entity or person who was in charge of maintenance during that year (e.g. covered bridge) for the year of the annual report. Explain whether the cost incurred for these amounts for the respective annual report year(s) are indicative of the costs for the past five (5) years.
2. Refer to Attorney General hearing exhibits 5-9, the annual reports of Brocklyn Utilities (2018), Fox Run Utilities (2018), Lake Columbia Utilities (2016 and 2017) and Airview Utilities (2018). Provide support and explanations for the amounts included as costs on the "Sewer Operation and Maintenance Expenses (Ref Page: 9)" for the year of the annual report. Any response should reconcile the amounts included under line "Owner/Manager-Managements Fee" with the information contained or not contained on page 11 of the report, titled "Principal Officers." Explain whether the cost incurred for all of these amounts for the respective annual report year(s) are indicative of the costs for the past five (5) years.
3. Provide an update to P.R. Wastewater Management, Inc.'s 2018 annual report, page 35 ("Sewer Plant Statistics – Treatment Plant Operating Statistics (Ref Page: 11)), for the first two lines based on actual data from 2018.

Electronic Proposed Acquisition by Bluegrass Water Utility Operating Company, LLC. and the Transfer of Ownership and Control of Assets by P.R. Wastewater Management, Inc., 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.

Case No. 2019-00104

Attorney General's Post-Hearing Data Requests

4. Provide an update to the Joint Applicants' response to PSC Staff 1-1 for any known discrepancies, including the table provided to response to subparts (a), (b), (c) and (g).
5. Refer to Application JA Exhibit L. Provide the amounts as of June 30, 2019 in lieu of the amounts ending December 31, 2018.
6. Provide a copy of the agreement that evidences CSWR, LLC's post-acquisition access to equity capital, including the amount of equity capital available and any requirements to receiving and maintaining capital.
7. Provide the capital investment worksheet(s) that accompanies the engineering memorandum already provided in the record that supports the amounts as presented in Application JA Exhibit N.
8. Provide minutes or some other documentation that evidences Marshall County Environmental Services, LLC change from a two-member LLC to a single-member LLC, with Mr. Artis as the sole member.