

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

*Electronic Application of Bluegrass Water* )  
*Utility Operating Company, LLC for an* )  
*Adjustment of Rates and Approval of* )  
*Construction* )

Case No. 2020-00290

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**Response to  
Attorney General's Post Hearing Request for Information**

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Applicant Bluegrass Water Utility Operating Company, LLC (hereinafter "Bluegrass"), herewith submits its response to the Attorney General's Post Hearing Request for Information. A signed, notarized verification for this Response appears on the following page. The undersigned counsel is responsible for any objection noted for a particular response.

Respectfully Submitted,

/s/ Kathryn A. Eckert

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*Counsel for Bluegrass Water Utility  
Operating Company*

VERIFICATION

STATE OF MISSOURI )  
 )  
COUNTY OF ST. LOUIS )

I, Mike Duncan, Vice President of Central States Water Resources, Inc., the manager of Applicant Bluegrass Water Utility Operating Company, LLC being duly sworn, state that I prepared or supervised the preparation of the following responses to the Commission Staff's Post-Hearing Request for Information, the Attorney General's Post-Hearing Data Requests, and Joint Intervenors' Post-Hearing Data Requests, and that the matters and things set forth in the responses are true and correct to the best of my knowledge, information and belief formed after reasonable inquiry.



MERANDA K. KEUBLER  
My Commission Expires  
November 13, 2022  
St. Louis County  
Commission #14631487

*[Handwritten Signature]*  
Mike Duncan

Subscribed and sworn to this 27th day of May 2021, before me a Notary Public in and before said County and State.

*[Handwritten Signature]*  
Notary Public

(SEAL)

My Commission expires: 11/13/2022

### **Request**

1. For each and every “Construction Item” that Mr. Jacob Freeman testified has been completed or partially completed at the time of his testimony, provide all receipts, invoices, and other documentation necessary to demonstrate the actual cost accrued for those items.
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### **Response**

Please refer to the invoices produced in response to 4 PSC 15 for documentation necessary to demonstrate actual cost accrued for items that Jacob Freeman testified at the hearing were completed or partially completed. To assist with identifying the relevant invoices, Bluegrass has prepared an Excel workbook which is separately filed with the name *AG post-hearing DR 01.xlsx*.

- **AG-PH1** tab: A 106-row listing of completed or partially completed construction items by service area, including an item code and total actual costs.
- **Construction Invoices** tab: A listing of invoices, with vendor name, invoice ID, service area, \$ amount, and the corresponding item code.