

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BLUEGRASS)	
WATER UTILITY OPERATING COMPANY, LLC)	CASE NO.
FOR AN ADJUSTMENT OF SEWAGE RATES)	2022-000432

**SCOTT COUNTY, KENTUCKY
SECOND SUPPLEMENTAL REQUESTS FOR INFORMATION TO
BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC**

Comes now Scott County, Kentucky (“Scott County”), by and through counsel, and, pursuant to the Kentucky Public Service Commission’s (“PSC” or “Commission”) Order dated June 29, 2023, files into the record in the instant proceeding its Second Supplemental Requests for Information to Bluegrass Water Utility Operating Company, LLC (“Bluegrass Water” or “Company”) for response by Bluegrass Water in accordance with that Order and the instructions below.

- 1) In each case in which a request seeks information provided in response to a request of Commission Staff or another party, reference to the Company’s response to the appropriate request will be deemed a satisfactory response.
- 2) Please identify the Company’s witness who will be prepared to answer questions concerning the request during an evidentiary hearing.
- 3) These requests shall be deemed continuing and require further and supplemental responses if the Company receive or generate additional information within the scope of these request between the time of the response and the time of any evidentiary hearing held by the Commission.

- 4) If any request appears confusing, please request clarification directly from Counsel for Scott County.
- 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 which would not be self-evident to a person not familiar with the printout.
- 7) If the Company has any objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify Counsel for Scott County 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 person to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.
- 9) In the event that 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 policy.
- 10) As the Company discovers errors in its filing and/or responses, please provide an update as soon as reasonable that identifies such errors and provide the document(s) to support any changes.

11) If the Company adds, amends, or withdraws any part of the application and the changes results in a change in a Company response to a request for information, please provide an updated response.

WHEREFORE, Scott County respectfully submits its Second Supplemental Requests for Information to Bluegrass Water.

Respectfully submitted,

/s/ David E. Spenard

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NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notice that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 13th day of July, 2023, in conformity with the Commission's April 14, 2023 Order of procedure in the instant case. Pursuant to the Commission's Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to Novel Coronavirus Covid-19*, the paper, in paper medium, is not required to be filed.

/s/ David E. Spenard

NOTICE AND CERTIFICATION CONCERNING SERVICE

No party has been excused from the electronic filing procedures in the instant proceeding.

/s/ David E. Spenard

SCOTT COUNTY, KENTUCKY
SECOND SUPPLEMENTAL REQUESTS FOR INFORMATION TO
BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC

1. Reference: Bluegrass Water’s supplemental response to Scott County’s Initial Requests for Information, Item 20 parts (f) and (g) (“Scott 1-__”). The supplemental responses to parts (f) and (g) do not reference or include the Recommended Order of the Hearing Examiner (entered April 14, 2023) in Mississippi Public Service Commission Docket No. 2022-UN-087, *In Re: Notice of Intent of Great River Utility Operating Company, LLC to Establish State-Wide Rates for Wastewater Disposal Service in Its Certificated Area in Mississippi*.

a. State whether information concerning Docket No. 2022-UN-087 was inadvertently omitted from Bluegrass Water’s supplemental response. If yes, confirm that the information for Docket No. 2022-UN-087 (described above) should be included in the response. If no, state why information concerning Docket No. 2022-UN-087 should not be included.

b. Notwithstanding the response to sub-part (a) above; Item 20 part (f) requests: “For any other CSWR, LLC Entity operating in another jurisdiction, identify each instance in which an entity has proposed a rate design that incorporates principles of gradualism, preventing rate shock, economic development and/or affordability and provide a copy of the pertinent section of the application and/or docket through which the proposal was made.” The supplemental response identifies three (3) dockets (one (1) each in Kentucky, Louisiana, and Mississippi, the latter being 2022-UN-86). Confirm that these three (3) dockets are the only other instances in which a CSWR, LLC Entity operating in another jurisdiction has proposed a rate design that incorporates principles of gradualism, preventing rate shock, economic development and/or affordability. If this cannot be confirmed, provide information concerning every other instance in which a proposal was made that falls within the scope of the data request.

c. If there are additional instances identified in response to sub-part (b) of this request (above), then provide the corresponding information requested under Item 20 part (g) of Scott County’s Initial Requests for Information for each instance. **Note:** It is not necessary for Bluegrass Water to supply the Recommended Order of the Hearing Examiner (entered April 14, 2023) in Mississippi Public Service Commission Docket No. 2022-UN-087.