

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
POST-HEARING 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”) instructions during the evidentiary hearing, files into the record in the instant proceeding its Post-Hearing Requests for Requests for Information to Bluegrass Water Utility Operating Company, LLC (“Bluegrass Water” or “Company”) for response by Bluegrass Water in accordance with the Commission’s instructions and those 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) 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 the submission of the reply briefs in the instant case.
- 3) If any request appears confusing, please request clarification directly from Counsel for Scott County.

- 4) 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.
- 5) 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.
- 6) 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.
- 7) 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.
- 8) 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.
- 9) 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.

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

WHEREFORE, Scott County respectfully submits its Post-Hearing Requests for Information to Bluegrass Water.

Respectfully submitted,

/s/ David E. Spenard

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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 21st day of September, 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
POST-HEARING REQUESTS FOR INFORMATION TO
BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC**

1. Reference: Bluegrass Water's Second Supplemental Responses to Commission Staffs Third Request for Information (filed September 13, 2023), Supplemental Exhibit PSC 3-7.

a. Refer to BT-1, Line Number 2, Column D (Post-Filing Adjustments). Provide a schedule depicting the item-by-item detail of the composition of the negative \$130,898 amount listed as an adjustment to Total Original Cost Rate Base.

b. Refer to BT-1, Line Number 4, Column D (Post-Filing Adjustments). Provide a schedule depicting the item-by-item detail of the composition of the \$259,168 amount listed as an adjustment to Operating Income at Present Rates.