

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC APPLICATION OF)	
BLUEGRASS WATER UTILITY)	
OPERATING COMPANY, LLC FOR AN)	Case No. 2022-00432
ADJUSTMENT OF SEWAGE RATES)	

**BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC’S
RESPONSE IN OPPOSITION TO SCOTT COUNTY, KENTUCKY’S
APPLICATION FOR REHEARING**

Bluegrass Water Utility Operating Company, LLC (“Bluegrass Water” or the “Company”), by counsel, hereby files its Response in Opposition to Scott County, Kentucky’s (“Scott County”) Application for Rehearing.

The Commission should deny Scott County’s Application for Rehearing. The Commission’s Final Order thoroughly sets forth the facts upon which the Commission reached its conclusions. Scott County’s Application for Rehearing is a continuation of its request for special ratemaking to the benefit of the commercial customers in the Delaplain service area, which would violate Kentucky law. *See* KRS 278.170(1). This is evidenced by the fact that Scott County challenges the Commission’s Final Order on behalf of the Delaplain service area, even though its citizens served by the Longview service area were granted a rate *reduction*.

Accordingly, the Commission should deny Scott County’s Application for Rehearing.

Respectfully submitted,

/s/ Edward T. Depp

John E. Selent
Edward T. Depp
R. Brooks Herrick
Sarah D. Reddick
DINSMORE & SHOHL LLP
101 South Fifth Street, Suite 2500
Louisville, KY 40202
502.540.2300
502.540.2529 (fax)
John.selent@dinsmore.com
Tip.depp@dinsmore.com
Brooks.herrick@dinsmore.com
Sarah.reddick@dinsmore.com

*Counsel to Bluegrass Water Operating
Company, LLC*

Certification

I hereby certify that a copy of this filing has been served electronically on all parties of record through the use of the Commission's electronic filing system, and there are currently no parties that the Commission has excused from participation by electronic means. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, a paper copy of this filing has not been transmitted to the Commission.

/s/ Edward T. Depp

*Counsel to Bluegrass Water Utility
Operating Company, LLC*