

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

In the Matter of:

ELECTRONIC APPLICATION OF BLUEGRASS)	
WATER UTILITY OPERATING COMPANY, LLC)	CASE NO. 2022-00432
FOR ADJUSTMENT OF SEWAGE RATES)	

**BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC’S
RESPONSES TO OFFICE OF THE ATTORNEY GENERAL’S
POST HEARING REQUEST FOR INFORMATION**

Bluegrass Water Utility Operating Company, LLC, (“Bluegrass Water” or the “Company”) by counsel, files its responses to the Office of the Attorney General’s Post Hearing Request for Information, issued in the above-captioned case on September 21, 2023.

FILED: October 6, 2023

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING
COMPANY, LLC FOR ADJUSTMENT OF SEWAGE RATES
CASE NO. 2022-00432

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE
OFFICE OF ATTORNEY GENERAL'S POST HEARING REQUEST FOR INFORMATION

REQUEST NO. 1: Provide excel file(s) in live format with all formulas intact demonstrating all calculations for the adjustments proposed in the Rebuttal Testimony of Brent Thies related to insurance expense.

a. Please reconcile the Insurance Adjustment calculation supported by Mr. Thies with the calculations provided by OAG witness Dittmore in Exhibit DND-10.

RESPONSE: See **CONFIDENTIAL Exhibit OAG PH-1.**

(a) The total adjustment to test year insurance expense reflected by Mr. Thies and Mr. Dittmore is identical. However, as is reflected on CONFIDENTIAL Exhibit OAG PH-1, Bluegrass Water included a 1% gross revenue conversion to arrive at the total adjustment to the Revenue Requirement, whereas Mr. Dittmore did not, which accounts for the discrepancy.

Witness: Brent Thies

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REQUEST NO. 2: Provide excel file(s) in live format with all formulas intact demonstrating all calculations for the adjustments proposed in the Rebuttal Testimony of Brent Thies related to the site visit waiver.

RESPONSE: See Exhibit OAG PH-2.

Witness: Brent Thies

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REQUEST NO. 3: Provide excel file(s) in live format with all formulas intact demonstrating all calculations for the adjustments proposed in the Rebuttal Testimony of Brent Thies related to the Randview system.

a. Please reconcile the Company's stated revenue requirement impact from the Randview sale referenced as \$7,779 on page 3 of Mr. Thies' rebuttal testimony with the \$59,208 calculated in response to Attorney General Data Request 1-56.

b. Does Mr. Thies acknowledge that the Revenue Requirement used to calculate the Company's Base Rates should be reduced by \$59,208 due to the Randview sale? If not, provide a comprehensive explanation detailing why such amount as contained in the response to Attorney General Data Request 1-56 is not an accurate reflection of the appropriate reduction to the revenue requirement.

RESPONSE: (a) **The \$7,779 revenue requirement impact of the Randview sale was incorrectly included in Mr. Thies' rebuttal testimony and in Supplemental Exhibit 3-7. The calculation of \$59,208 provided in OAG Request 1-56 is the correct impact on the revenue requirement.**

(b) **Yes, as indicated in the preceding response the revenue requirement impact of the Randview sale is \$59,208.**

Witness: Brent Thies

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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE
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REQUEST NO. 4: Identify the amount of rate base associated with all remote monitoring equipment for which the Company seeks recovery.

a. Further, identify where those values can be found in the record of this case. Specifically, identify where all values associated with remote monitoring were included in or excluded from rate base and cite to the specific schedule/cell reference provided in prior documents submitted to the Commission.

RESPONSE: See Exhibit OAG PH-4, which reflects the exclusion of all Mission remote monitoring equipment from rate base and the inclusion of all High Tide remote monitoring equipment in rate base.

Witness: Brent Thies

