

**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 SCOTT COUNTY’S SECOND SUPPLEMENTAL  
REQUEST FOR INFORMATION**

Bluegrass Water Utility Operating Company, LLC, (“Bluegrass Water” or the “Company”) by counsel, files its responses to Scott County Kentucky’s Second Supplemental Request for Information, issued in the above-captioned case on July 13, 2023.

**FILED:        July 27, 2023**

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**REQUEST NO. 3-1:** 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,

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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.

**RESPONSE: (a) Yes, Mississippi Docket No. 2022-UN-87 was inadvertently omitted. Mississippi Docket No. 2022-UN-86 and No. 2022-UN-87 were companion dockets for water rates and wastewater rates, with substantively identical proposals related to rate design being made in both cases. The cases were both established on July 25, 2022; on August 2, 2022, the Mississippi Public Service Commission designated a single representative to take all action to expedite the processing of both dockets; on February 28, 2023, the Mississippi Public Service Commission ordered a consolidated hearing of the two dockets; on March 14, 2023, Mississippi Public Service Commission staff issued a joint recommendation for both dockets; and the final orders were issued in both proceedings on the same day. The inadvertent omission was a mere oversight borne out of the consolidation of the proceedings for multiple purposes.**

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**(b) Bluegrass Water objects to this request as argumentative and as seeking a legal conclusion. Without waiving this objection and subject to it, Bluegrass Water confirms that it has identified all instances falling within its understanding of the scope of this request.**

**(c) Please see Bluegrass Water's Response to subpart (b).**

**Witness: Aaron Silas**

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As to objections,

/s/ Edward T. Depp

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Operating Company, LLC*

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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO SCOTT COUNTY KENTUCKY'S SUPPLEMENTAL REQUEST FOR INFORMATION

VERIFICATION

I, Aaron Silas, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.




\_\_\_\_\_  
Name: Aaron Silas  
Title: Director of Regulatory Operations  
Bluegrass Water Utility Operating Company, LLC

STATE OF MISSOURI    )  
  ) ss:  
COUNTY OF ST. LOUIS                                    )

SUBSCRIBED AND SWORN TO before me on this the 16<sup>th</sup> day of JULY, 2023.

My commission expires: OCT 16, 2026

  
\_\_\_\_\_  
Notary Public