

**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
SECOND SUPPLEMENTAL 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 Second Supplemental Request for Information, issued in the above-captioned case on July 12, 2023.

FILED: July 27, 2023

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

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OFFICE OF ATTORNEY GENERAL'S SECOND SUPPLEMENTAL
REQUEST FOR INFORMATION

REQUEST NO. 3-1: Refer to the Supplemental response to AG 1-6A, part 2 of 4. Provide a comprehensive discussion identifying the reason(s) for the significant increase in Bluegrass Direct charges for the months of April, May, and June, compared with the other months within the test period.¹

RESPONSE: In Q2, 2022, consistent with Commission rules and its order in the 2020 rate case, CSWR employees began preparing and executing CPCN and financing case filings on behalf of Bluegrass Water. As a result, that time was directly assigned to Bluegrass Water.

Witness: Brent Thies

¹ While Exhibit OAG 1-6A is subject to a pending confidentiality motion, the highlighted portion of the request does not disclose any specific information referenced in that Exhibit. Consequently, while the Company appreciates the Attorney General's abundance of caution, the Company has removed the highlighting from the data request.

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VERIFICATION

I, Brent Thies, 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.

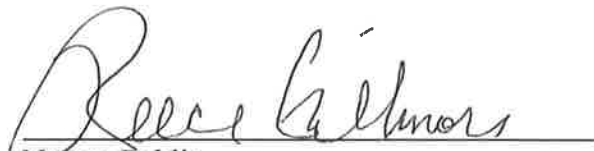


Name: Brent Thies
Title: Vice President and Corporate Controller
Bluegrass Water Utility Operating Company, LLC

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

SUBSCRIBED AND SWORN TO before me on this the 27th day of JULY, 2023.

My commission expires: OCT 16th, 2026


Notary Public