

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY-)	
AMERICAN WATER COMPANY FOR AN)	CASE NO. 2025-00122
ADJUSTMENT OF RATES)	

**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT’S
SECOND REQUEST FOR INFORMATION**

In accordance with the Public Service Commission’s (“Commission”) May 27, 2025 Order, Lexington-Fayette Urban County Government (“LFUCG”) propounds the following data requests upon the Applicant Kentucky-American Water Company (“KAWC”). KAWC shall respond to these requests in accordance with the provisions of the Commission’s Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate LFUCG’s request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for LFUCG.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. 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.

7. If KAWC objects to any request on any grounds, please notify counsel for LFUCG as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: 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 retention policy.

10. These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

Respectfully submitted,



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Requests for Information

1. Please refer to KAWC's Response to Item 56 of LFUCG's First Request for Information. For each of the PFAS manufacturers—including but not limited to 3M, DuPont, Tyco, and BASF—provide or identify the following:
 - a. The base score(s) for KAWC that has(have) been issued.
 - b. Whether KAWC is contesting or otherwise seeking an adjustment to the assigned base score.
 - c. The projected net dollar amount per point value of the base score for KAWC.
 - d. The anticipated total net settlement amount for KAWC.
 - e. When KAWC anticipates receiving the revenue from these settlements.
 - f. How KAWC will account for revenue received through these settlements.
 - g. Whether KAWC has included the anticipated revenue as a part of its calculation of proposed rates. If it has, please explain how. If it has not, please explain why not.
2. Identify expenses (capital and operational) that KAWC has incurred related to the treatment of water containing PFAS.
3. Identify projected expenses (capital and operational) that KAWC anticipates incurring in 2026 related to the treatment of water containing PFAS.