COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	)	
	)	
Electronic Application of Bluegrass	)	
Water Utility Operating Company, LLC	)	
For an Adjustment of Water and	)	
Sewage Rates	)	**Case No. 2025-00354**
	)	

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO 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 Attorney General's Post-Hearing Request for Information, issued in the above-captioned case on September 29, 2026.

FILED: October 12, 2026

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR AN ADJUSTMENT OF WATER AND SEWAGE RATES
CASE NO. 2025-00354

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

REQUEST NO. 1:

Please provide the current monthly customer charge of Yung Farm Estates, Magruder Village, and Commonwealth Wastewater Connect.

RESPONSE: The current monthly customer charges are as follows:

Magruder Village: Adopted following the acquisition of this non-regulated system, is $35.00/month.

Yung Farm Estates: Adopted following the acquisition of this non-regulated system, is $60.00/month.

Commonwealth Wastewater Connect: Adopted following the acquisition of this regulated system, the current charge is $34.92/month

Witness: Aaron Silas, Vice President

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR AN ADJUSTMENT OF WATER AND SEWAGE RATES
CASE NO. 2025-00354

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

REQUEST NO. 2:

Refer to page 7 of the rebuttal testimony of Caitlin O'Reilly. Please provide a detailed breakdown of how government affair costs by category will be incurred in the forecasted test year and provide supporting documentation for the breakdown of these activities.

RESPONSE: Please refer to the CONFIDENTIAL Exhibit provided in response to OAG Request No. 61. For supporting documentation, please see CONFIDENTIAL "Exhibit OAG PHDR 2 - Governmental Affairs." All government affair costs consist of allocated employee costs attributable to the Director of National Regulatory Affairs.

Witness: Caitlyn O'Reilly, Direct of Regulatory and Plant Accounting

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR AN ADJUSTMENT OF WATER AND SEWAGE RATES
CASE NO. 2025-00354

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

REQUEST NO. 3:

Please refer to Bluegrass Water's response to question 73 of the AG's third request for information. Please provide the same information for 2019 through 2020.

RESPONSE: The Company does not have information responsive to this request for 2019. Bluegrass Water's first acquisition in Kentucky closed in September 2019, and the Company does not have the records necessary to provide this information for 2019. Please see "Exhibit OAG 3-73" for the available 2020 information.

Witness: Caitlyn O'Reilly, Direct of Regulatory and Plant Accounting

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR AN ADJUSTMENT OF WATER AND SEWAGE RATES
CASE NO. 2025-00354

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

REQUEST NO. 4:

Please refer to Bluegrass Water's response to question 74 of the AG's third request for information. Please provide the same information for 2019 through 2020.

RESPONSE: The Company does not have information responsive to this request for 2019. Bluegrass Water's first acquisition in Kentucky closed in September 2019, and the Company does not have the records necessary to provide this information for 2019. Please see "Exhibit OAG 3-74" for the available 2020 information.

Witness: Caitlyn O'Reilly, Direct of Regulatory and Plant Accounting

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR AN ADJUSTMENT OF WATER AND SEWAGE RATES
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE ATTORNEY GENERAL'S POST-HEARING REQUEST FOR INFORMATION

REQUEST NO. 5:

Please refer to page 5 of the rebuttal testimony of Aaron Silas. Please provide the percentage of water and wastewater customers that are also on unmetered water systems.

RESPONSE: Bluegrass Water does not maintain information regarding the metering status of water service provided to sewer-only customers. Accordingly, the Company cannot determine the percentage of wastewater customers that are served by unmetered water systems. According to the Company's records, approximately 76% of Center Ridge water customers do not have metering infrastructure. The remaining 24% of Center Ridge water customers, have metering infrastructure; however, as approved by the Commission, the Center Ridge water customers have been on a unified, flat monthly rate since before the Company acquired Center Ridge.[1]

Witness: Aaron Silas, Vice President

1 *See In the Matter of: Application of Center Ridge Water District Inc. for an Adjustment of Rates Pursuant to the Alternative Rate Filing Procedure for Small Utilities*, Case No. 2010-00397.

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR AN ADJUSTMENT OF WATER AND SEWAGE RATES
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BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE ATTORNEY GENERAL'S POST-HEARING REQUEST FOR INFORMATION

REQUEST NO. 6:

Please provide an estimate of the costs to install meters used to determine unaccounted for water including all supporting calculations and documents.

RESPONSE: Based upon CSWR's overall experience operating water systems, the estimated cost of a typical residential water meter installation ranges from approximately $600 to $1,000. This estimate includes the parts, materials, and labor associated with a typical meter installation.

Actual costs may vary depending on local costs and site-specific conditions, including accessibility, excavation, restoration, and the condition and location of existing service lines.

Witness: Aaron Silas, Vice President

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR AN ADJUSTMENT OF WATER AND SEWAGE RATES, CASE NO. 2025-00354

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

VERIFICATION

I, Caitlin O'Reilly, 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.

Caitlin O'Reilly
Director of Regulatory & Plant Accounting
Bluegrass Water Utility Operating Company, LLC

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

SUBSCRIBED AND SWORN TO before me by Caitlin O'Reilly on this the 15th day of October, 2026.

My commission expires: 04-10-2027

Roshawne Vallandingham
Notary Public

ROSHAWNE VALLANDINGHAM
Notary Public - Notary Seal
Jefferson County - State of Missouri
Commission Number 23414639
My Commission Expires Apr 10, 2027

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR AN ADJUSTMENT OF WATER AND SEWAGE RATES, CASE NO. 2025-00354

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE OFFICE OF THE ATTORNEY GENERAL'S POST-HEARING REQUESTS 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.

Aaron Silas
Vice President
Bluegrass Water Utility Operating Company, LLC

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

SUBSCRIBED AND SWORN TO before me by Aaron Silas on this the 12th day of October, 2026.

My commission expires: 04-10-2027

Roshawne Vallandingham
Notary Public

ROSHAWNE VALLANDINGHAM
Notary Public - Notary Seal
Jefferson County - State of Missouri
Commission Number 23414639
My Commission Expires Apr 10, 2027