

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**SCOTT COUNTY, KENTUCKY
SUPPLEMENTAL REQUESTS FOR INFORMATION**

REDACTED (PUBLIC) VERSION

Comes now Scott County, Kentucky ("Scott County"), by and through counsel, and tenders its Supplemental Requests for Information to Bluegrass Water Utility Operating Company, LLC ("Bluegrass Water" or "Company").

- 1) In each case in which a request seeks information provided in response to a request of Commission Staff, reference to the Company's response to the appropriate Staff request will be deemed a satisfactory response.
- 2) Please identify the Company's witness who will be prepared to answer questions concerning the request during an evidentiary hearing.
- 3) These requests shall be deemed continuing and, therefore, 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 evidentiary hearing held by the Commission.
- 4) If any request appears confusing, please request clarification directly from Counsel for Scott County as soon as reasonable.

- 5) To the extent that the specific document, workpaper, or information as requested does not exist, 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 who is not familiar with the printout.
- 7) If the Company has any objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify Counsel for Scott County as soon as reasonable.
- 8) For any document withheld on the basis of privilege, state the following: the date; author; addressee; indicated or blind copies; all persons to whom it was distributed, shown, or explained; and the nature and legal basis for the privilege asserted.
- 9) In the event that any document called for has been destroyed or transferred beyond the control of the Company, state: a) The identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; b) the time, place, and method of destruction or transfer; and, c) the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the policy.
- 10) As the Company discovers errors in its filing and/or responses, please provide an update as soon as reasonable that identifies such errors and provide the document(s) to support any changes.

WHEREFORE, Scott County respectfully submits its Supplemental Requests for Information to Bluegrass Water.

Respectfully submitted,

/s/ David E. Spenard

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NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notices that the public (redacted) electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 20th day of March 2026. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), the paper, in paper medium, is not required to be filed. The nonredacted version has been transmitted to the Executive Director of the Commission by electronic mail message with a copy to the Applicant and the Kentucky Office of the Attorney General.

/s/ David E. Spenard

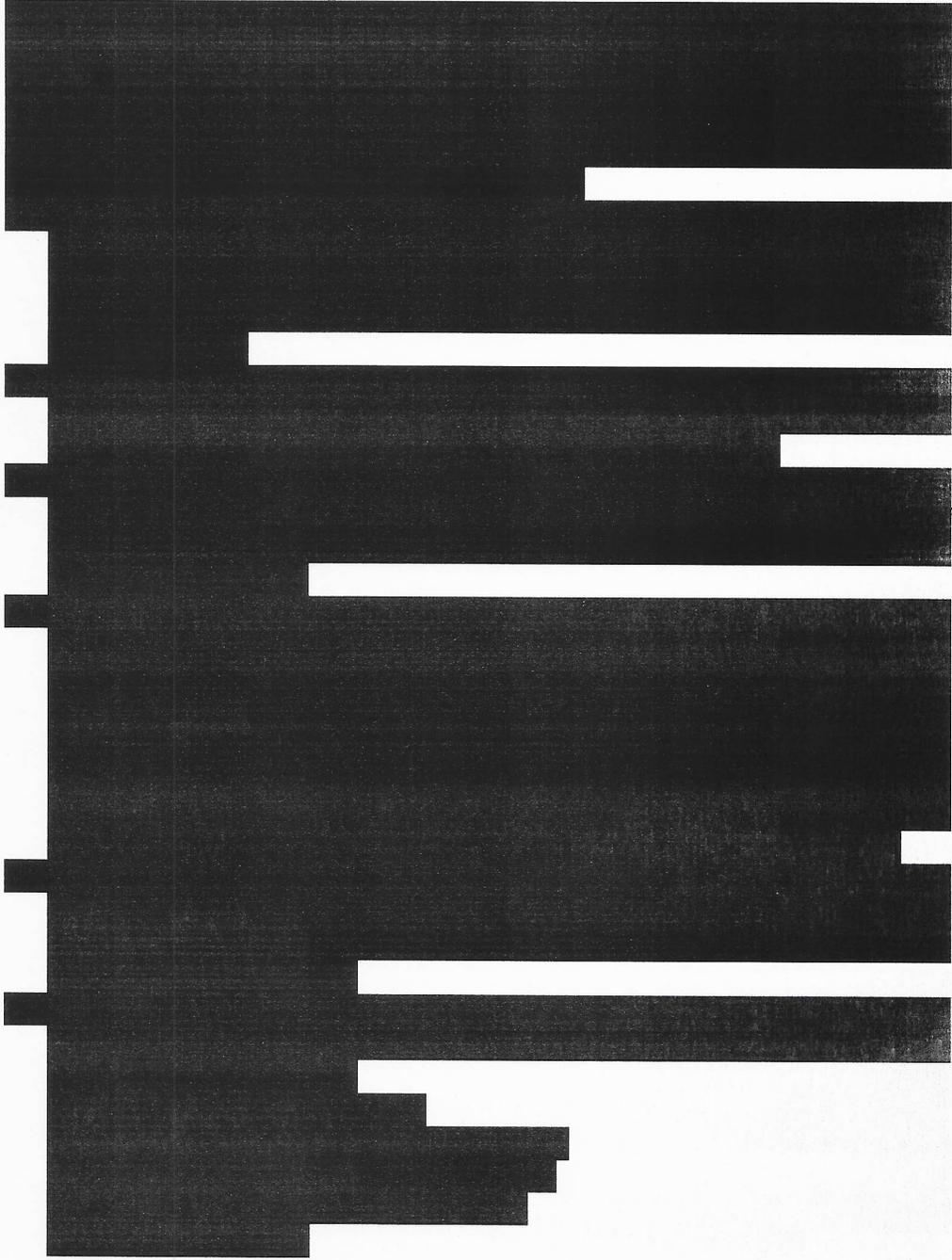
NOTICE CONCERNING SERVICE

The Commission has not yet excused any party from electronic filing procedures for this case.

/s/ David E. Spenard

**Scott County, Kentucky's
Supplemental Initial Requests for Information
Case Number: 2025-00354**

2-1. In data response "CONFIDENTIAL SC 1-9 Engineering Memo - Delaplain Disposal - Sewer - 2021.11.05, page 1,
[BEGIN CONFIDENTIAL]



[END CONFIDENTIAL]

- 2-2. Please provide in electronic Excel format, with all formulas intact, the flow contribution, as a percentage of total to the Company's system, by rate class, and by customer category, i.e., residential and non-residential, for the following categories:
- Annual average daily flow.
 - Maximum monthly average daily flow.
 - Maximum weekly average daily flow.
 - Maximum daily average daily flow.
 - Peak hourly flow.
- 2-3. Please provide in electronic Excel format, with all formulas intact, the flow contribution to the Delaplain facility, by rate class, and by customer category, i.e., residential and non-residential.
- 2-4. Referring to Bluegrass Water's response to SC 1-20, Exhibit SC 1-20, please provide a copy of this workbook in electronic Excel format, with all formulas intact. The provided Exhibit SC 1-20 groups lifts into locational categories. Additionally, please group all lifts, within each location, i.e., "KY – Airview," "KY – Arcadia Pines," etc., into rate class, so the workbook allows the viewer to calculate the number of lifts, by location, and rate class.
- 2-5. Referring to Bluegrass Water's response to SC 1-21, Exhibit SC 1-21, please provide a copy of this workbook in electronic Excel format, with all formulas intact. The provided Exhibit SC 1-21 groups mains into locational categories. Additionally, please group all mains, within each location, i.e., "KY – Airview," "KY – Arcadia Pines," etc., into rate class, so the workbook allows the viewer to calculate length and diameter of mains, by location, and rate class. Please indicate the following:
- What is meant by the value "0" in the "diameter" column of SC 1-21? Is this a specific measurement, meaning all mains marked "0" for diameter have X diameter, if so, what is the diameter indicated by a "0" value? Or, is this to indicate the diameter of the specified main is unknown? Please indicate the unit of measurement used for the diameter column.
 - Is the column labeled "Shape_Len" a measurement of main length in feet?
- 2-6 Provide a copy of the **[BEGIN CONFIDENTIAL]** [REDACTED]
[END CONFIDENTIAL] referenced on page 1 of 9 of Confidential SC 1-9.