

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
INITIAL REQUESTS FOR INFORMATION
(THIRD SET OF REQUESTS)**

Comes now Scott County, Kentucky (“Scott County”), by and through counsel, pursuant to the Kentucky Public Service Commission’s (“PSC” or “Commission”) May 26, 2026 Order of procedure, and tenders its Initial 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 Initial 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 electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 18th day of June 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.

/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
Initial Requests for Information
(Third Set of Requests)
Case Number: 2025-00354**

- 3-1 Please refer to the first set of requests issued to the Company by Scott County. Please supplement the Company's responses to the first set of requests with updated information based on the Company's revised filing, where applicable. This request includes, but is not limited to, requests for production of all Excel workbooks used in the Company's revised filing.
- 3-2 Please refer to the response to Scott County's Request No. 1-10.
 - a. Please state the alternative allocation percentages that were discussed internally by Bluegrass Water.
 - b. Please provide an analysis showing how the investments and expenses incurred on the Delaplain wastewater system support an allocation of 40% of the revenue requirement to Delaplain non-residential customers.
- 3-3 Please refer to the response to Scott County's Request No. 1-11. In electronic spreadsheet format with all formulas and links intact, please provide the workpapers that were used to derive the equivalency factors in PSC Case No. 2022-00432, and which continue to be used by the Company in this case.
- 3-4 Please refer to Application Exhibit 8, Direct Testimony of Jacob Freeman at page 58, lines 5-9.
 - a. Please explain how the Company ensures wastewater discharged from non-residential customers complies with the requirements of the customer service agreements.
 - b. Under the current Delaplain non-residential rate structure, do all non-residential Delaplain customers bear the costs incurred by the Company to treat wastewater that violates the customer service agreements associated with certain non-residential customers? If yes, please explain how the costs are assigned.
 - c. What information would the Company need to collect in order to assign the costs associated with treating wastewater that does not comply with customer service agreements to the customers that are violating the agreements?
- 3-5 Regarding the amendment to the application, please state whether there has been any interruption or change in Bluegrass Water's billing practices during the period since the filing of the initial application. If yes, please describe the interruption or change and, further, state any remedial measures taken.