

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)

**ATTORNEY GENERAL’S SECOND REQUEST FOR INFORMATION TO
BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC**

Respectfully submitted,

RUSSELL COLEMAN
ATTORNEY GENERAL



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Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on March 20, 2026 an electronic copy of the foregoing was served via the Commission's electronic filing system.

This 20th day of March 2026.

A handwritten signature in blue ink, appearing to read "Thomas J. Johnson", enclosed in a thin black rectangular border.

Assistant Attorney General

Data Requests

1. Provide all presentations, slide decks, memoranda, or other materials prepared for or presented to any credit rating agency (including but not limited to S&P Global Ratings, Moody's Investors Service, and Fitch Ratings) from January 1, 2022 to the present that reference or relate to the Company's financial condition, capital structure, cost of capital, regulated operations, or the rates proposed in this proceeding.
2. Provide all presentations, slide decks, or other materials prepared for or presented at utility conferences, or regulatory forums (including but not limited to conferences hosted by NARUC, MARUC, SEARUC, or similar organizations) from January 1, 2022 to the present that reference or relate to the Company's financial performance, capital investment plans, regulatory strategy, rate design, or expected returns.
3. State whether Bluegrass Water has identified any systems or customer groups within its service territory with materially higher arrearage rates, delinquency rates, or nonpayment balances than the system wide average. If so, identify each such system or customer group and explain whether the Company evaluated whether the proposed rates would have a material effect on customers in those areas.
4. Identify the number of customer accounts for which bills were returned as undeliverable or otherwise not successfully delivered within the past three years and describe Bluegrass Water's process for identifying and correcting such issues. For each year, provide the number of accounts affected and the estimated revenue lost, if discernable.

- a. Explain if any uncollected or unbilled revenue identified is treated in the Company's revenue requirement and whether such amounts are being recovered from paying customers through the proposed rates.
5. See Response to AG 1-15. For the capital supplied to Bluegrass Water by CSWR, LLC, specifically identify the ultimate source of those funds and all levels that funding passes through. Further, describe whether that funding is debt or equity and fully describe why the company makes those conclusions. Provide all supporting documentation.
6. Acquisitions. Refer to the Company's response to the Attorney General's First Request No. 1-47 (b) which states that it does not seek to recover any costs relating to any proceeding identified on Exhibit OAG 1-47. The Exhibit lists Case No. 2020-00028 Randview. Confirm that the Company is requesting recovery of the return on Randview cost as well as the annual amortization expense in this case.
7. Acquisition related costs. Refer to the application generally. Provide the total acquisition related/transaction costs (including but not limited to due diligence analysis, legal fees, engineering expenses, O&M expenses, closing costs, etc.) incurred for each of the following systems:
 - a. Commonwealth Westwater,
 - b. Magruder Village,
 - c. Yung Farms,
 - d. Moon River Resort
8. Explain how the above costs for each of the acquisitions in subparts a-d are reflected in the revenue requirement. Also for each, provide the account numbers to which these

costs were initially recorded, and transferred and the dates the entries were recorded. Provide copies of all journal entries associated with the acquisitions.

9. Acquisition related costs. Refer to the Company's response to the Attorney General's First Request No. 48 which requested: "the total amount of acquisition related attorney fees included in plant in service the [sic] in the base period and in the forecasted test year. Also include all corresponding amounts (accumulated depreciation, depreciation expense, etc.)." The response refers to the response to PSC 2-51. This information is not contained in the response to PSC 2-51. Provide the information originally requested in AG 1-48.
10. Acquisition Adjustment. Refer to the attachment provided in the Company's response to the Attorney General's First Request No 1-47. Did the Company include an acquisition adjustment for Moon River Resort in the forecast test year revenue requirement? If so, provide the total amount included and include all calculations showing how the amount was derived.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. Acquisition Adjustment. Refer to Exhibit 7, page 24.
 - a. Provide the purchase price and the net book value for the Commonwealth purchase.
 - b. Provide a description of the land parcels that the Company believes were omitted from the net book value.

- c. Provide an estimate of the original cost of the land and land rights to the owner that first devoted the property to utility service. Include all supporting documentation.
 - d. State whether the prior owner of the Commonwealth was regulated by the Commission.
13. Advertising Expense. Refer to the Company's response to the Attorney General's First Request No. 46. Confirm that there are no advertising allocated from CSWR and US Water LLC and US Water Systems included in the forecast test year expenses, not just rate base. If there is, provide the amount included in the forecast test year expense separately for water and sewer.
14. Advertising Expense. Refer to the Company's response to the Attorney General's First Request No. 46. Confirm that there are no advertising expenses allocated from CSWR and US Water LLC and US Water Systems included in the forecast test year expenses, not just rate base. If there is, provide the amount included in the forecast test year expense separately for water and sewer.
15. Allocated Costs. Refer to the Company's response to the Attorney General's First Request No. 115.
- a. Explain the reason for the large increase in total expenses in 2024 over the 2023 level for both water and sewer.
 - b. Explain the reason for the extreme decrease in total costs in 2025 compared to the prior years for both water and sewer.
 - c. Explain the reason for the extreme increase in the total cost in the base year over the 2025 level for both water and sewer and explain why this level is expected to continue into the forecast test year.

- d. Explain the reason for the total increase in the forecasted test year over the base year level for both water and sewer.
 - e. Provide the 2021 and 2022 amounts for sewer as originally requested in AG 1-115 as they could not be located in Case No. 2022-00432.
16. Allocated Costs. Refer to the attachment provided in the Company's response to the Attorney General's First Request No. 124 in Case No. 2022-00432. Provide the actual annual calculations of the allocated overhead in the same format for each of the years 2020, 2021, 2022, 2023, 2024, 2025, the base period and the forecasted test year.
17. Allocation-Overhead. Refer to the Company's response to the Attorney General First Request for Information No. 113. Explain the reason for the increase in the overhead expenses at CSWR, LLC in 2024. Provide all documentation supporting the increase.
18. Accumulated Deferred Income Taxes. Refer to the Company's response to the Attorney General's First Request No. 74.
- a. Provide the net operating loss carryforward balances for each of the years 2020, 2021, 2022, 2023, 2024, 2025, the base year and the forecasted test year.
 - b. State when the Company expects the NOLs to be exhausted.
 - c. Provide the amount of Bluegrass's federal and state income tax expense for each of the of the years 2020, 2021, 2022, 2023, 2024, 2025, the base year and the forecasted test year.
 - d. Provide the amount of Bluegrass's federal and state income tax paid for each of the of the years 2020, 2021, 2022, 2023, 2024, and 2025.
 - e. Explain how the Company's books are in compliance with Generally Accepted Accounting Principles by not recording accumulated deferred income taxes

corresponding to the differences between the tax net operating losses and the Company's tax expense on its books.

19. Income Tax Expense. Refer to the Company's response to the Attorney General's First Request No. 74. Explain why income tax expense should be included in the revenue requirement if the Company does not expect to pay any income taxes in the forecast test year due to net operating losses.
20. Bluegrass allocation. Refer to Exhibit 16. Provide the percentage allocated by CSWR to Bluegrass water and wastewater for payroll and benefits in the forecasted test year.
21. Business Development. Refer to the application generally. Provide the total amounts of Business Development Costs incurred by CSWR LLC in 2024 as well as the total amount that was excluded before applying the overhead allocation factor to Bluegrass Water.
22. Board of Directors. Refer to the Company's response to the Attorney General's First Request No. 55.
 - a. Confirm that Central States Water Resources, US Water LLC and US Water Systems do not have Boards of Directors.
 - b. Confirm that no costs related to the above boards of directors' fees and meeting costs are included in the forecasted test year.
 - c. If these entities have boards of directors, provide the amounts included in the forecasted test year for board of director fees and meeting costs for water and wastewater
23. Customer Deposits. Refer to page 16 of the Sewer Tariff which states "At this time. Bluegrass Water UOC does not require a deposit for new customers." Did the Company

at any time require deposits for customers? If so, does the Company still hold those deposits or were they all refunded to customers? If the Company still has possession of the prior deposits, provide the current balance of customer deposits for water and sewer held by the Company and state when they will be returned.

24. Capital Projects. Refer to the Company’s response to the Attorney General’s First Request No. 64. Provide the Company’s definitions of “capital maintenance” and “capital project.”

25. Capital Maintenance Projects. Refer to the Company’s response to the Attorney General’s First Request No. 140. Provide a description of and the total cost of each of the following capital maintenance projects: Magruder Village, Commonwealth Wastewater and Center Ridge Water District.

26. Plant in Service. Refer to the Company’s response to the Attorney General’s First Request No. 63 Attachment.

- a. Explain the reasons for the large decrease in water plant in 2023 over the 2022 level.
- b. Explain the reason for the decrease in water plant in the base period over the 2025 level.

27. Customer metrics. Refer to the attachment provided in the Company’s response to the Attorney General’s First Request No. 69. Provide the customer metric data annually for each year 2020, 2021, 2022, 2023, 2024 and 2025.

28. Compensation and Benefits. Provide all studies supporting the compensation and benefits costs included in the forecasted test year.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

30. Customer Service Expense. Refer to Exhibit 5 page 17 which states “these cost reductions are expected to increase over time as Intelogix agents gain familiarity with CSWR systems and as call deflection and self-service channels expand.” Provide an estimate of the annual cost reductions expected to occur.

31. Customer Service Expense. Refer to the Company’s response to the Attorney General’s First Request No. 66.

- a. Explain what the “other amounts” represent and the “other” amount included in the forecast test year.
- b. Explain what the advertising relates to and the total amount that is included in the forecast test year.

32. Caregiver Expense. Refer to the Company’s response to the Attorney General’s First Request No. 70. The response states that Bluegrass water does not provide this and this expense is not included in its rate base. Confirm that CSWR LLC, US Water LLC and US Water Systems do not offer these benefits and no expenses allocated from are included in the forecast test year expenses as well as rate base. If there is, provide the expense amount included in the forecast test year expense separately for water and sewer.

[REDACTED]

[REDACTED]

[REDACTED]

34. Company Events Expense. Refer to the Company's response to the Attorney General's First Request No. 72. The response states that Bluegrass Water removed all company events expense from rate base. Confirm that there are no Company events expense from CSWR, US Water LLC and US Water Systems included in the forecast test year expenses as well as rate base. If there is, provide the expense amount included in the forecast test year separately for water and sewer.

35. Contractor Operations Expense. Refer to the Company's response to the Attorney General's First Request No. 127.

- a. Provide the calculations showing how the base and forecast test year were derived on the attachment.
- b. Explain the reason for the large increase in total spending for 2025 over the 2024 level for wastewater.
- c. Explain the reason for the decrease in total spending for the forecast test year over the 2024 level for water.

36. Donations Expense. Refer to the Company's response to the Attorney General's First Request No. 79. The response states that Bluegrass Water has not included any of these expenses in its rate base. Confirm that there are no donations from CSWR, US Water LLC and US Water Systems included in the forecast test year expenses, as well as rate base. If there is, provide the expense amount included in the forecast test year separately for water and sewer.

37. Employee Gifts. Refer to the Company's response to the Attorney General's First Request No. 90. The response states that the Company has not included any of these expenses in its rate base. Confirm that there are no employee gifts included in the forecast test year expenses as well as rate base. If there is, provide the expense amount included in the forecast test year separately for water and sewer.
38. Entertainment/Sponsorships. Refer to the Company's response to the Attorney General's First Request No. 91. The response states that Bluegrass Water has not included any of these costs in its rate base. Confirm that there are no entertainment sponsorship expenses included in the forecast test year expenses as well as rate base. If there is, provide the expense amount included in the forecast test year separately for water and sewer.
39. Dues Expense. Refer to the Company's response to the Attorney General's First Request No. 83. Confirm that there are no dues from CSWR, US Water LLC and US Water Systems included in the forecast test year expenses. If there is, provide the amount included in expense separately for water and sewer.
40. Financial Statements. Provide the annual financial statements and notes for CSWR LLC, US Water LLC and US Water Systems for 2023, 2024 and 2025.
41. Fines/Penalties. Refer to the Company's response to the Attorney General's First Request No. 139. List and quantify all fines and penalties incurred in 2024 as originally requested. Provide the account numbers in which they were recorded and explain where they were removed from the base period and forecast test period.
42. Health and Dental Insurance Expense. Refer to the attachment provided in the Company's response to the Attorney General's First Request No. 135. Provide the

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

47. Insurance Expense. Refer to the Company's response to the Attorney General's First Request No. 120 in Case No. 2022-00432.

- a. Explain the reason for the large increase in insurance expense in 2021 and 2022 over the 2020 total amount.
- b. Also refer to the Company's response to the Attorney General's First Request No. 111 in the current case. Explain the reason for the large decrease in insurance expense in 2023 over the 2021 and 2022 total amounts.
- c. State whether the amounts in the response to the Attorney General's First Request No. 120 in Case No. 2022-00432 are for water or sewer or both.

48. Insurance (D&O) Expense. Refer to the Company's response to the Attorney General's First Request No. 80. Confirm that there is no D&O expense from CSWR LLC, US Water LLC and US Water Systems included in the forecast test year expenses. If there is, provide the forecast test year amount included separately for water and sewer

49. Known and Measurable Adjustments. Refer to the Company's response to the Attorney General's First Request No. 28.

- a. Provide the known and measurable adjustments to the forecast test year in the same format.
 - b. Explain why many of the costs shown are reduced by 50%.
50. Legal Expense. Refer to the Application generally. Provide the total legal expense by vendor (excluding rate case expense) for each of the years 2020, 2021, 2022, 2023, 2024, 2025, the base period and the forecast test year separately for water and wastewater.
51. Late Payments. Refer to the Company's response to the Staff's Second Request for Information No. 18 (c). Explain why the Company does not intend to reach out to individual customers with recurring late payments.
52. Late Fees. Refer to the Company's response to the Attorney General's First Request No. 121.
- a. Explain the reason for the increase in wastewater late fees in 2024 over the prior years.
 - b. Explain the reason for the forecasted decrease in 2025 and the base period over the 2024 level for wastewater.
 - c. Provide the 2025 actual amounts as originally requested.
53. Operator Contract Expense. Refer to the Company's response to the Attorney General's First Request No. 127. State when the study is expected to be complete. If it has been completed, provide a copy of the study.
54. Operator Contract Expense. Refer to the Company's response to the Attorney General's First Request No. 127 Attachment.
- a. Explain the reason why the contract operations costs fluctuated from 2022 -2024.
 - b. Explain the reason for the large increase from 2024 to 2025 for wastewater.

- c. Explain the reason no cost was incurred in 2022 for water.
 - d. Explain the reason for the large increase in spending from 2023 to 2024 for water.
 - e. Explain the reason for the decrease in spending for water from 2024 to 2025 through the forecasted test year.
 - f. Provide the 2021 and 2025 actuals in the same format for water and wastewater as originally requested.
 - g. Provide documentation supporting the forecasted test year amounts (contract, invoices).
55. Payroll. Refer to Exhibit 16. For each employee listed, provide the amount related to Business Development removed from the forecast test period.
56. Payroll. Refer to Exhibit 16.
- a. Confirm that this represents the total forecast test period payroll and benefits that is allocated to Bluegrass. State whether this is before or after adjustments,
 - b. Provide the percentage allocated to Bluegrass.
57. Rate Case Expense. Refer to the Company's response to the Attorney General's First Request No. 151 and Exhibit 9 Tab titled "Income Statement Detail WW" Account 405.100 Amortization of Regulatory Assets Expense. According to the attachment provided in the response to AG-151 the rate case expense from the prior rate case (2022-00432) will be fully amortized in December 2026.
- a. Confirm that the amounts included in forecast test period (the months August 2026 through June 2027) in Exhibit 9 include the unamortized rate case expense from the prior rate case and the current rate case. If not, explain what is included in these monthly entries.

- b. If the answer to subpart a is yes, explain why the company continued to reflect the monthly amortization for the prior rate case expense in the months of January – June 2027 if it was going to be fully amortized in December 2026.
 - c. If the Commission adopts the Company’s request for amortization expense as reflected in this schedule, is it correct that the Company will collect \$585,842 annually (which includes the prior rate case and the current rate case expense amortization) until the next rate case?
 - d. The response states that “I propose that this amount be amortized into rates over three years and the unamortized portion be included in rate base.” Provide the total unamortized amount of rate case expense (prior case and current) included in rate base and the exhibit number and account number.
58. Randview Expense. Refer to page 44 of Exhibit 7 lines 1-4. Provide the account number and schedule where the expense portion of \$17,341 is reflected in the forecast test year.
59. Randview System Sale. Refer to the Application Generally. Did the Company have a choice not to sell this system? If not, how was the Company forced to sell this system? Who forced the sale and under what authority?
60. Randview System. Refer to the Application generally. How were current Bluegrass customers served by the Randview System?
61. Randview System. Refer to the Application generally. How are current Bluegrass customers being currently served by the Randview System?
62. Randview System. Refer to the Application generally.
- a. Provide the sales price paid by the Company to acquire the Randview System and the date of the acquisition.

- b. Provide the total expenses (legal, closing costs, etc.) by category incurred by the Company to execute the purchase.
 - c. Provide the net book value of the Randview System at the time of purchase.
 - d. Provide a detailed description of the Randview System and its location.
 - e. Provide the total sales price of the Randview System and the date of the sale to the City of Mayfield.
 - f. Provide the total expenses (legal, closing costs, etc.) by category incurred by the Company to execute the sale to Mayfield.
 - g. Provide the net book value of the Randview System at the time of sale to Mayfield.
63. Randview System. Refer to the Company's response to the Attorney General's No. 155. Provide a detailed explanation of the annex process.
64. SERP. Refer to the Company's response to the Attorney General's First Request No. 163. Confirm that CSWR LLC, US Water LLC and do not offer these benefits and no expenses allocated from them are included in the forecast test year expenses. If they do have SERP and allocate costs, provide the expense amount included in the forecast test year separately for water and sewer.
65. Software Costs. Refer to the Company's response to the Attorney General's First Request No. 146. Provide the 2021 and 2025 actual amounts as originally requested.
66. Severance Pay. Refer to the Company's response to the Attorney General's First Request No. 167.
- a. The response states that Bluegrass did not include any of these costs in the rate base. Is severance expense included the forecast test year operating expense? If not,

Identify the specific schedule(s) where the severance expense was removed from the forecast test year operating expense.

- b. Provide the account number(s) in which the Company booked severance expense in 2023, 2024 and 2025.
- c. Explain who the 2024 expense was paid to and why it is so much higher than prior years.

67. Third-party Damage Expenses. Refer to the Company's response to the Attorney General's First Request No. 172. The response states that no third-party damage reimbursements were included in the filing. Provide the amount of third-party damage expenses incurred for each year 2020, 2021, 2022, 2023, 2024, 2025, and included in the base period and forecasted test period as originally requested.

68. Uncollectible ratio. Refer to the Company's response to Staff 2-29 (a).

- a. Provide all documentation supporting the use of the 1% bad debt ratio.
- b. Confirm that the Company requested the same methodology in the Case No. 2022-00432 and it was not approved by the Commission.

69. Uncollectibles. Refer to the Company's response to the Attorney General's First Request No. 51.

- a. Explain the reason why the Company conducted the detailed review of delinquent accounts and related billing records in 2024.
- b. Provide the years that the writeoffs of \$100,623 pertained to.
- c. State the year all other similar detailed reviews were conducted prior to the 2024 detailed review.
- d. State when the Company expects another similar detailed review would occur.

70. Uncollectibles. Refer to the Company's response to the Attorney General's First Request No. 51. The response states that it "objects to this Request as ... seeking information about expenses there were already addressed in in the Company's last rate case, Case No, 2022-00432, to which the Attorney General was a party," and that 2019-2021 requested information was addressed in Case Nos. 2020-00290 and 2022-00432. The 2022-00432 rate case was only for wastewater. The Application in Case No. 2020-00290 case was filed on October 1,2020 and wouldn't have contained the full 2020 actual data.
- a. Provide the 2020, 2021 and actual amounts of revenues, write-offs and recoveries for water as originally requested.
 - b. Also provide the 2025 actual amounts of revenues, write-offs and recoveries for water and wastewater as originally requested.
71. Bad Debt expense. Refer to the Company's response to the Attorney General's First Request No. 52 which requests the bad debt expense for each year 2020-2025, the base period and the forecast test period for water and wastewater. The Company's response states that it seeks information about expenses that were already addressed in the Company's rate case 2022-00432, to which the Attorney General was a party. The prior rate case was only for an increase to wastewater. The Company's response also refers to its response in Exhibit OAG 1-75 for years 2022-2025. OAG 1-75 pertains to customer advances in aid of construction. Provide the 2020, 2021, 2022, 2023, 2024, 2025, the base period and forecasted test year as originally requested in the Attorney General's First Request No. 52.

72. Unaccounted for Water. Refer to the Company's response to the Attorney General's First Request No. 174. Explain in detail and quantify all issues with leaks and lost water in 2024 and 2025 and how the Company addressed these matters.
73. Unaccounted for Water. Refer to the Company's response to the Attorney General's First Request No. 173.
- a. Explain why the meters to measure water sold to calculated unaccounted for water are not installed.
 - b. Does the Company monitor the level of water that comes out of its system? If not, explain why not.
 - c. Does the Company monitor the level of water than customers receive? If not, explain why not.
74. Variance Reports. Refer to the Variance Reports provided in the Company's response to the Attorney General's First Request No. 177.
- a. Explain in detail what is included in other sewage operating revenue.
 - b. Explain the reason for the increase to other sewage operating revenue in 2025 and 2024 over the prior year levels.
 - c. Explain the reason for the large variance for Administrative and General Expense in 2025.
 - d. Explain the reason for the large underspending in 2025 for "Maint Treatm & Disposal Exp."
 - e. Explain in detail what the legal and engineering capital investment of \$229,748 in 2025 relates to.

- f. Explain in detail what the legal and engineering capital investment of \$247,053 in 2024 relates to. State where this amount is reflected in the forecasted test year.
 - g. Provide the total amount of legal and engineering costs capital investment costs that are included in the forecast test period and identify the schedule where they are reflected.
75. Vegetation Management. Refer to the Application generally. Provide the total vegetation management expense for each of the years 2020, 2021, 2022, 2023, 2024 2025, the base period and the forecasted test year. separately for water and wastewater.
76. Tank Painting Expense. Refer to the Application generally. Provide the total amount of tank painting expense for each of the years 2020, 2021, 2022, 2023, 2024, 2025, base period and forecasted test year separately for water and wastewater. Also identify the account number and the exhibit where these costs are reflected.
77. Tank Painting. Refer to the Application generally. Provide documentation supporting the amount of tank painting expense included in the forecasted test year.
78. Paid time off. Refer the Company's response to the Attorney General's First Request No. 178 (a). Provide a detailed explanation of the unlimited paid time off benefit including which employees are eligible for unlimited paid time off.
79. Volunteer Time. Refer to the Company's response to the Attorney General's First Request No. 178. If the Company does not track the paid time off for volunteering, how did the Company conclude there was no paid volunteer time included in the forecasted test year?
80. Volunteer Time. Refer to the Company's response to the Attorney General's First Request No. 178.

- a. Identify all the events that took place in 2024 and 2025.
- b. Identify the number of and description of planned events for the base year and forecasted test year.

81. Water Expenses. Refer to the Application generally. Provide the forecasted test year amounts for the following water expense categories:

- a. purchased water,
- b. fuel and power,
- c. chemicals expense and
- d. waste disposal.