

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
KENTUCKY-AMERICAN WATER COMPANY	)	
FOR AN ADJUSTMENT OF RATES,	)	CASE NO. 2026-00094
APPROVAL OF SYSTEM IMPROVEMENT	)	
PROGRAM, AND TARIFF CHANGES	)	

KENTUCKY-AMERICAN WATER COMPANY’S DATA REQUESTS
TO THE ATTORNEY GENERAL, LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT, AND GEORGETOWN MUNICIPAL WATER AND SEWER
SERVICE

Kentucky-American Water Company (“KAWC” or “Company”) respectfully submits the following data requests to the Office of the Attorney General (“AG”), Lexington-Fayette Urban County Government (“LFUCG”), and Georgetown Municipal Water and Sewer Service (“GMWSS”)(collectively “Intervenors”) to be answered by September 10, 2026, as specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter May 27, 2026.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, text messages, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to Intervenors, their witnesses, or their counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if Intervenor receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If Intervenor objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

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

8. In the event any document requested has been destroyed or transferred beyond the control of Intervenor, their counsel, or their witnesses, state: 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 such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of or active link to the document rather than a reference to the record where the document is located.

Data Requests

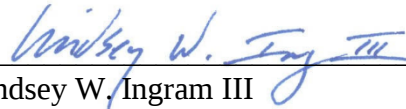
1. All Intervenor witnesses. Provide, in Excel spreadsheet or other format, with all formulas, columns and rows unprotected and fully accessible, all workpapers and source documents not previously provided relied upon by Intervenor in this matter.
2. Mr. Azevedo. Provide a detailed description of GMWSS’ “program of major upgrades to the Royal Spring water treatment” referenced at page 9 of the Azevedo testimony. Include a description of all upgrades for the period 2026 to 2036.
3. Mr. Azevedo. Reference page 9 of the Azevedo testimony. State whether the amount of water purchased from KAWC in February and March of 2026 at the Champion Way interconnection will be repeated in 2027. If not, state the amount of water GMWSS expects to purchase at the Champion Way interconnection in 2027.
4. Mr. Azevedo. Reference page 9 of the Azevedo testimony. State whether the Royal Spring water treatment plant is planned to be taken off-line during 2027 for any reason. If so, state the reason. Provide the same information for every year from 2028 to 2036. If there are plans to take the Royal Spring water treatment plant off-line at any time during the next 10 years, provide the amount of water GMWSS plans to purchase from KAWC at the Champion Way interconnection.
5. Mr. Azevedo. Reference page 9 of the Azevedo testimony. Describe how frequently GMWSS conducts a “clarifier project” at the Royal Spring treatment plant. State when such a project was last conducted prior to 2026 and state when such a project is expected to happen next.
6. Mr. Azevedo. Reference page 9 of the of the Azevedo testimony. State who at GMWSS “made a request to KAWC distribution personnel to open the connection” and to whom it was made. Provide the date and time of the request and describe how it was made. Provide a detailed narrative describing the request, including the circumstances giving rise to the request, all individuals involved, the manner in which the request was communicated and any actions taken in response. Produce all documents that describe, memorialize, transmit or relate to that request.
7. Mr. Azevedo. Provide a copy of all documents that set forth, govern, memorialize or otherwise describe the contractual or legal relationship between KAWC and GMWSS for water purchases at the Champion Way interconnection. If unable to produce such document(s), describe in detail the nature of the relationship, including the basis upon which GMWSS purchases water from KAWC at the Champion Way interconnection.

8. Mr. Azevedo. Reference page 9 of the Azevedo testimony. Provide a copy of all documents by which GMWSS provided advance notice to KAWC of the expected increase in water purchased by GMWSS from KAWC in February and March of 2026 as a result of the Royal Spring water treatment plant being taken off-line. If no such documents exist, state so expressly and identify whether any advance notice was provided orally. If advance notice was provided orally, identify the individuals involved, to whom at KAWC the communication was made, the date, and a detailed description of the substance of the communication.
9. Mr. Azevedo. Reference page 10 of the Azevedo testimony. State who at GMWSS contacted KAWC personnel “about the mistaken, estimated bills” and to whom at KAWC that contact was made. Provide the dates and times of those contacts. Provide all documents describing or making those contacts. If no such documents exist, state so expressly and identify whether any communication was conducted orally. If communication was conducted orally, identify the individuals involved, with whom the “mistaken, estimated bills” were discussed, the date, and a detailed description of the substance of the communication.
10. Mr. Azevedo. Reference page 9 of the Azevedo testimony. Provide a copy of all documents by which GMWSS provided advance notice to the Frankfort Plant Board of the expected increase in water purchased by GMWSS from the Frankfort Plant Board in February and March of 2026 as a result of the Royal Spring water treatment plant being taken off-line.
11. Mr. Azevedo. Reference page 12 of the Azevedo testimony. Provide a copy of the 2022 Water Source Assessment. State whether it is the most recent Water Source Assessment GMWSS has performed. If there is a more recent one, provide it. State when the next Water Source Assessment is expected to be performed.
12. Mr. Azevedo. Reference Mr. Azevedo’s June 2, 2026 Affidavit in support of GMWSS’ Motion to Intervene in this matter. State whether Mr. Azevedo included any explanation in that affidavit as to why GMWSS’ purchases from KAWC increased significantly in February and March of 2026 and whether those increased purchases are expected again in 2027. If he did not, explain why not.
13. Mr. Rothschild. Please provide copies of the complete workpapers, supporting documents, electronic files, including all calculations and formulae intact, and electronic versions of any spreadsheets prepared by Mr. Rothschild to support his Direct Testimony, and Exhibits ALR 1 through ALR 10.
14. Mr. Rothschild. Please provide complete copies of all cited works referenced in Mr. Rothschild’s Direct Testimony.

15. Mr. Rothschild. Please provide all workpapers in native format, including all calculations and formulae intact, supporting Chart C-1 in Appendix C to Mr. Rothschild's Direct Testimony.
16. Mr. Rothschild. Please provide a copy or link to each of the five most recent direct testimonies and exhibits, outside of Case No. 2026-00094, in which Mr. Rothschild testified regarding rate of return or cost of common equity.
17. Mr. Rothschild. Please provide all data used to develop the Option-Implied analyses performed by Mr. Rothschild for the RFC Water Proxy Group and the Bulkley Proxy Group. The data requested includes all workpapers that demonstrate the option-implied betas and growth rates that were relied upon to develop his analysis.

Dated: August 27, 2026

Respectfully submitted,



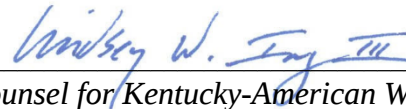
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CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8 as modified by the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on August 27, 2026; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



*Counsel for Kentucky-American Water
Company*