

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

<i>Electronic</i> APPLICATION OF KENTUCKY-	)	
AMERICAN WATER COMPANY FOR AN	)	
ADJUSTMENT OF RATES, APPROVAL OF	)	Case No. 2026-00094
SYSTEM IMPROVEMENT PROGRAM,	)	
AND TARIFF CHANGES	)	

**Georgetown Municipal Water and Sewer Service Post-Hearing Requests
to Kentucky-American Water Company for Information**

Georgetown Municipal Water and Sewer Service (“GMWSS”) herewith submits its Post-Hearing Requests for Information to Kentucky-American Water Company (“KAWC”). See attached Requests ##1-5. KAWC should provide GMWSS with its responses on or before October 30, 2026, in accordance with the 10/20/26 scheduling Order. In responding to these requests, KAWC should follow the general instructions given in Staff data requests, *e.g.*, the 10/20/26 Commission Staff’s Post-Hearing Request for Information to Kentucky-American Water Company pp.1-2. If KAWC has questions about the scope, nature or other specifics of the information requested, please contact the undersigned counsel for clarification or possible narrowing/modification of the request.

Respectfully submitted,

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ATTORNEYS FOR GMWSS

1. Refer to the hearing testimony of Mr. Lewis [10/13/26 HVT ca. 11:40:27-11:41:30 A.M.] and to GMW Hearing Exhibit 3 (attached hereto), which consists of p.61 (*pumping and water statistics, part three*) from KAWC's 2024 and 2025 Annual Reports and lists both the City of Midway and the City of Versailles as having no limit (maximum or minimum) on their wholesale water purchases from KAWC.
 - a. Confirm that the terms and conditions of KAWC's arrangements with the City of Midway and with the City of Versailles do not include a minimum or maximum usage amount.
 - b. Produce the contract(s) with the City of Midway and the City of Versailles.
2. Refer to the hearing testimony of Mr. Rae in which he affirmed that no Sales for Resale volumes for Georgetown Municipal had been assumed in the cost of services study (COSS), then expressed uncertainty as to such volumes that might have been included and what 2023-2025 historical usage data showed about Sales for Resale volumes to Georgetown Municipal [10/13/26 HVT ca. 4:03:20–4:08:13 P.M.]:
 - a. State the Sales for Resale volume and revenue in the base period in the Application, the base period update, and the Test Year. Explain how KAWC derived each figure.
 - b. With respect to the volume and revenue provided in KAWC's response to subpart 2.a. above, provide the volume and revenue attributable to Georgetown Municipal in the base period in the Application, the base period update, and the Test Year. Explain how KAWC derived each figure.

- c. Confirm the volume and revenue for Sales for Resale and, within that category, for Georgetown Municipal that were used in the COSS and explain how KAWC derived each figure.
 - d. Identify each COSS calculation — whether for the base period in the Application, the base period update, or the Test Year —for which zero (or no) Sales for Resale volumes to Georgetown Municipal were used.
 - e. In performing the COSS, what volume(s) did KAWC assume for Georgetown Municipal? How did it determine the volume(s)?
3. On the same topic as phDR #2 (above): For each additional 10,000 gallons of Sales for Resale usage projected for Georgetown Municipal in the Test Year (CY 2027), what is the effect on the Sales for Resale rate indicated by the cost of service study? Please show your calculations or provide all workpapers for your response.
4. Refer to Mr. Rae’s hearing testimony in which he stated in response to questions that he would have to check the tariff charges (current and proposed) for Bulk Sales service customers [10/13/26 HVT ca. 4:22:59-4:24:46 P.M.]:
- a. Confirm that Bulk Sales service customers are not charged a meter rate in either the current tariff or as proposed by KAWC in this rate case.
 - b. State the number of monthly meter charges at each meter size that were included in the projected 2027 revenues for the Bulk Sales customer class in the cost of service study (COSS).
 - c. State the Bulk Sales volumetric rate indicated by the COSS if no meter charge revenues were attributed to the customer class for the 2027 forecasted Test Year. Please show your calculations or provide all workpapers for your response.

5. Refer to Mr. Burton’s 10/14/26 hearing testimony [HVT ca. 10:20:44–10:25:24 (*esp.* ca. 10:22:36 and 10:23:19), 10:33:20–10:33:28 A.M.] in which he refers to at least two “gating factors”. Please list the gating factors mentioned in his testimony and explain what a “gating factor” is in the context of KAWC’s internal decision-making about capital spending (or as otherwise applicable). List and describe any other such “gating factors” in KAWC’s internal decision-making about capital spending (or as otherwise applicable).

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Pumping and Water Statistics - part four (Ref Page: 32)

Entity Receiving Water		Maximum Daily	Maximum Monthly
If water is sold to other water utilities for redistribution, identify all entities with whom the utility has a water sales contract and the maximum quantity the utility is under contract			
to provide daily and monthly. If unlimited then list "unlimited" otherwise list in thousands of gallons.			
City of Midway	unlimited		unlimited
City of Nicholasville	650		20150
City of Versailles	unlimited		unlimited
Jessamine South Elkhorn Water District (2)	1152		35712
Harrison County Water District	150		4650
Georgetown Municipal Water and Sewer Service	950		28500
East Clark Water	2.1		65
Peaks Mill Water District	5		155
Nicholas County Water District			1500
Judy Water Association	70		2100

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