

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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**THE ATTORNEY GENERAL, LEXINGTON-FAYETTE URBAN COUNTY  
GOVERNMENT, AND GEORGETOWN MUNICIPAL WATER AND SEWER  
SERVICE’S RESPONSE TO KENTUCKY AMERICAN WATER COMPANY’S FIRST  
REQUEST FOR INFORMATION**

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The intervenors, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“Attorney General”), Lexington-Fayette Urban County Government (“LFUCG”), by counsel, and Georgetown Municipal Water and Sewer Service (“GMWSS”), by counsel, submit the following response to Kentucky-American Water Company’s (“Kentucky American”) First Request for Information in the above-styled matter.

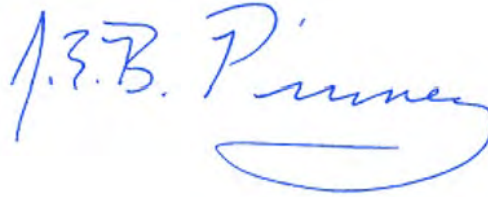
Respectfully submitted,

RUSSELL COLEMAN  
ATTORNEY GENERAL



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ANGELA M. GOAD  
J. MICHAEL WEST  
LAWRENCE W. COOK  
T. TOLAND LACY  
JOHN G. HORNE II  
ASSISTANT ATTORNEYS GENERAL  
1024 CAPITAL CENTER DRIVE, SUITE 200  
FRANKFORT, KY 40601  
PHONE: (502) 696-5421  
FAX: (502) 564-2698  
[Angela.Goad@ky.gov](mailto:Angela.Goad@ky.gov)  
[Michael.West@ky.gov](mailto:Michael.West@ky.gov)  
[Larry.Cook@ky.gov](mailto:Larry.Cook@ky.gov)  
[Thomas.Lacy@ky.gov](mailto:Thomas.Lacy@ky.gov)  
[John.Horne@ky.gov](mailto:John.Horne@ky.gov)



STURGILL, TURNER, BARKER & MOLONEY, PLLC

James W. Gardner

Rebecca Price

J.E.B. Pinney

333 W. Vine Street, Suite 1500

Lexington, Kentucky 40507

Telephone No.: (859) 255-8581

Facsimile No.: (859) 231-0851

[jgardner@sturgillturner.com](mailto:jgardner@sturgillturner.com)

[rprice@sturgillturner.com](mailto:rprice@sturgillturner.com)

[jpinney@sturgillturner.com](mailto:jpinney@sturgillturner.com)

and

David J. Barberie, Commissioner of Law

Gabriel Thatcher, Attorney Senior

Department of Law

200 East Main Street

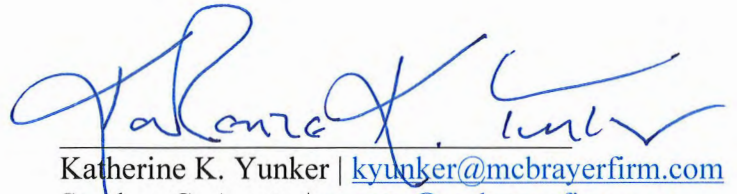
Lexington, Kentucky 40507

(859) 258-3500

[dbarberi@lexingtonky.gov](mailto:dbarberi@lexingtonky.gov)

[gthatcher@lexingtonky.gov](mailto:gthatcher@lexingtonky.gov)

*Attorneys for Lexington-Fayette Urban County  
Government*



Katherine K. Yunker | [kyunker@mcbayerfirm.com](mailto:kyunker@mcbayerfirm.com)

Stephen G. Amato | [samato@mcbayerfirm.com](mailto:samato@mcbayerfirm.com)

McBRAYER PLLC

201 East Main Street, Suite 900

Lexington, KY 40507

(859) 231-8780

*ATTORNEYS FOR GMWSS*

**Certificate of Service and Filing**

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that the foregoing electronic filing was transmitted to the Commission on September 10, 2026, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 10<sup>th</sup> day of September, 2026,



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Assistant Attorney General

WITNESSES RESPONSIBLE:

JOHN DEFEVER

AARON L. ROTHSCILD

QUESTION NO. 1

Page 1 of 2

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.

RESPONSE:

Supporting workpapers associated with the Direct Testimony of John Defever in excel spreadsheet format are being filed contemporaneously with the responses..

With respect to Mr. Rothschild's supporting workpapers and documents, please see the documents and excel spreadsheets filed contemporaneously with this response, and note the following:

- 1) "Rothschild Testimony Sources" zipped folder contains sources referenced in Mr. Rothschild's Direct Testimony.
- 2) "Rothschild CoC Calculation" zipped folder contains:
  - a. 2026.06.30 - KAWC Cost of Capital (Bulkley PG).xlsx – High level calculations for Bulkley Proxy Group (Water and Gas) based on lower level inputs.
  - b. 2026.06.30 - KAWC Cost of Capital (RFC Water PG).xlsx – High level calculations for Water only proxy group based on lower level inputs.
- 3) "Rothschild Fundamentals" zipped folder contains:
  - a. 2026.06 - Interest Rates.xlsx – Details regarding historical interest rates, yields, and yield spreads. Some tabs are copied and feed into the main model.
  - b. 2026.06 - SPX MRP and TS.xlsm – Detailed Market Risk Premium Calculations. Some tabs are copied and feed into the main model.
  - c. 2026.06 - Bulkley PG Betas – SELECT.xlsx – Consolidates historical and option-implied betas and option-implied growth rates for the proxy groups. Some tabs are copied and feed into the main model.
  - d. 2026.06 - Bulkley PG Betas – COE CHART.xlsx – Consolidates historical CAPM calculations for Bulkley mixed proxy group for presentation in Appendix C, Chart C-1.
- 4) "Rothschild Value Line and Zacks Data" zipped folder contains:
  - a. 2026.06 – Bulkley PG Manual Data.xlsx – Summary and details of data obtained from Value Line Reports and from Zacks.com. "MnlData" tab is copied and feeds into the main model.
  - b. Two "Value Line Reports" and one "Zacks Reports" subfolders which respectively contain original Value Line and Zacks reports for each company.
- 5) "Rothschild Water OptIVA Results" zipped folder contains detailed option-implied beta and option-implied growth calculations for water companies.

- 6) “Rothschild Gas OptIVA Results 1” and “Rothschild Gas OptIVA Results 2” zipped folders contain detailed option-implied beta and option-implied growth calculations for gas companies.
- 7) “Rothschild Water Stock Option Source Data” zipped folder contains original raw stock option source data for water companies.
- 8) “Rothschild Gas Stock Option Source Data” zipped folder contains original raw stock option source data for gas companies.
- 9) “Rothschild Water Historical Betas” zipped folder contains summarized and detailed historical beta calculations for water companies, including original stock market pricing data upon which analysis is based.
- 10) “Rothschild Gas Historical Betas 1” and “Rothschild Gas Historical Betas 2” zipped folders contain summarized and detailed historical beta calculations for gas companies, including original stock market pricing data upon which analysis is based.

WITNESS RESPONSIBLE:

No Attorney General/LFUCG/GMWSS Joint Witness Identified

QUESTION NOS. 2 - 12

Page 1 of 1

RESPONSE:

No responses are necessary as Mr. Azevedo is not a Joint Witness, but instead is exclusively a witness of GMWSS.

WITNESS RESPONSIBLE:  
AARON L. ROTHSCILD

QUESTION NO. 13  
Page 1 of 1

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.

RESPONSE:

Please refer to the response to Question No. 1.

WITNESS RESPONSIBLE:  
AARON L. ROTHCHILD

QUESTION NO. 14  
Page 1 of 1

Mr. Rothschild. Please provide complete copies of all cited works referenced in Mr. Rothschild's Direct Testimony.

RESPONSE:

Please refer to the response to Question No. 1, Item 1.

WITNESS RESPONSIBLE:  
AARON L. ROTHCHILD

QUESTION NO. 15  
Page 1 of 1

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.

RESPONSE:

Please refer to the response to Question No. 1, Item 3(d).

WITNESS RESPONSIBLE:  
AARON L. ROTHSCHILD

QUESTION NO. 16  
Page 1 of 1

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.

RESPONSE:

Please refer to the folder titled “Rothschild Five Most Recent Testimonies” filed contemporaneously with these responses.

WITNESS RESPONSIBLE:  
AARON L. ROTHSCILD

QUESTION NO. 17  
Page 1 of 1

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.

RESPONSE:

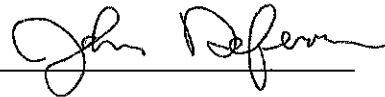
Please refer to the response to Question No. 1, Items 5-8.

AFFIDAVIT

STATE OF MICHIGAN )

COUNTY OF WAYNE )

John Defever, Senior Regulatory Consultant, being duly sworn, states that his responses in the above referenced case are true and accurate to the best of his knowledge, information and belief.



John Defever

Sworn to and subscribed before me on this 10th day of September 2026.



Notary Public

CHRISTINE MILLER  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF WAYNE  
MY COMMISSION EXPIRES Nov 8, 2028  
ACTING IN COUNTY OF

Wayne

AFFIDAVIT

STATE OF CONNECTICUT

COUNTY OF FAIRFIELD

AARON L. ROTHSCILD, being duly sworn, states that his responses in the above referenced case are true and accurate to the best of his knowledge, information, and belief.

  
Aaron L. Rothschild



Sworn to and subscribed before me on this 9<sup>th</sup> day of September 2026.

  
Notary Public

**VIDA M. ROTHSCILD**  
**NOTARY PUBLIC**  
My Commission Expires May 31, 2027