## COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

h	n t	h	۱ د	М	at	tc	ı۲	0	f٠

ELECTRONIC APPLICATION OF BLUEGRASS	)	CASE NO.
WATER UTILITY OPERATING COMPANY, LLC	)	2022-00432
FOR AN ADJUSTMENT OF SEWAGE RATES	)	

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO THE OFFICE OF THE ATTORNEY GENERAL

The Office of the Attorney General (Attorney General), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on July 28, 2023. The Commission directs the Attorney General to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

<sup>&</sup>lt;sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID- 19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Attorney General shall make timely amendment to any prior response if the Attorney General obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which the Attorney General fails or refuses to furnish all or part of the requested information, the Attorney General shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, the Attorney General shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Testimony of David Dittemore (Dittemore Testimony), Exhibit DND-4 through Exhibit DND-13. Provide those exhibits and all related work papers in Excel spreadsheet format with all formulas, rows, and columns fully accessible, unprotected, and intact.

Juda C. Bridwell

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED \_\_\_\_\_ JUL 13 2023

cc: Parties of Record

\*Angela M Goad Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204 \*Honorable John E Selent Attorney at Law Dinsmore & Shohl, LLP 101 South Fifth Street Suite 2500 Louisville, KENTUCKY 40202 \*Sarah D. Reddick Dinsmore & Shohl, LLP 101 South Fifth Street Suite 2500 Louisville, KENTUCKY 40202

\*Aaron Silas Central States Water Resources 1650 Des Peres Road Suite 303 St. Louis, MISSOURI 63131 \*Honorable Kerry E Ingle Attorney at Law Dinsmore & Shohl, LLP 1400 PNC Plaza 500 West Jefferson Street Louisville, KENTUCKY 40202 \*Edward T Depp Dinsmore & Shohl, LLP 101 South Fifth Street Suite 2500 Louisville, KENTUCKY 40202

\*R. Brooks Herrick
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202

\*Lawrence W Cook Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204

\*Cameron R Culbertson Scott County Attorney 198 E. Washington St. Georgetown, KENTUCKY 40324

\*Bluegrass Water Utility Operating Company, LLC 1630 Des Peres Road, Suite 140 St. Louis, MO 63131

\*Honorable David Edward Spenard Strobo Barkley PLLC 239 South 5th Street Ste 917 Louisville, KENTUCKY 40202 \*Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

\*Dave Woodsmall Central States Water Resources 1650 Des Peres Road Suite 303 St. Louis, MISSOURI 63131 \*Russ Mitten Central States Water Resources 1650 Des Peres Road Suite 303 St. Louis, MISSOURI 63131

\*John Horne
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

\*Randal A. Strobo Strobo Barkley PLLC 239 South 5th Street Ste 917 Louisville, KENTUCKY 40202