

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BERNICE COYLE WATSON TACKETT)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2025-00148
BLUEGRASS WATER UTILITY OPERATING)	
COMPANY, LLC)	
)	
DEFENDANT)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC

Bluegrass Water Utility Operating Company, LLC (Bluegrass Water), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 16, 2025. The Commission directs Bluegrass Water to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission mandated electronic filing, with exception to *pro se* formal complaints filed against utilities). *Pro se* parties in formal complaint cases may submit responses by U.S. Mail addressed to the Public Service Commission at 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615, or by electronic email sent to PSCED@ky.gov. Responses filed using electronic email should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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

Bluegrass Water shall make timely amendment to any prior response if Bluegrass Water 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 Bluegrass Water fails or refuses to furnish all or part of the requested information, Bluegrass Water 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, Bluegrass Water shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

A copy of this request shall be served on Mr. Charles Tackett II, Ms. Bernice Coyle Watson Tackett power of attorney by U.S. certified mail, return receipt requested to Care

of Mr. Charles Tackett II, for Ms. Bernice Coyle Watson Tackett, 2029 Longview Drive, Georgetown, Kentucky 40324.

Regarding Longview/Homestead Wastewater Treatment Plant (Longview WWTP), located at 3243 Frankfort Road, Georgetown, Kentucky 40324:

1. Refer to Bluegrass Water's response to Commission Staff's First Request for Information (Staff's First Request), Item 3 in which Bluegrass Water stated in pertinent part as follows:

The routine maintenance protocol includes, but is not limited to, periodic cleaning, visual inspections, and condition assessments of the sewer mains, manholes, and lift stations to ensure that the Longview WWTP and the collecting sewers are regularly inspected and adequately maintained. Specifically, Bluegrass Water conducts inspections of sewer lines, manholes, and lift stations in the Longview Drive area at least once annually, consistent with Commission regulations. (Emphasis added.)

Also refer to the video provided in Bluegrass Water's response to Staff's First Request, Item 6, specifically video footage at 92.97 ft., 146.67 ft., 158.53 ft, 184.47 ft., and 185.47 ft.

a. State whether the video of the 8-inch Vitrified Clay Pipe provided by Bluegrass Water is the public sewer trunk line, or main, as opposed to the private sewer lateral.

b. State the specific date in which the affected sewer line shown in the video was inspected immediately prior to the March 21, 2025 video.

c. State who inspected the affected sewer line immediately prior to the March 21, 2025 video, including the company and name of the individual(s) who conducted the inspection.

- d. State whether there is a video of that prior inspection. If so, provide that video.
- e. Provide documentation of what, if anything, was discovered during that prior inspection.
- f. State what if any work was done on the sewer during that prior inspection.
- g. State whether Bluegrass Water contends that the root systems observed infiltrating the 8-inch Vitrified Clay Pipe in the March 21, 2025 video are less than a year old.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **SEP 30 2025** _____

cc: Parties of Record

Bernice CW Tackett
2029 Longview Drive
Georgetown, KY 40324

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