

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BLUEGRASS	)	
WATER UTILITY OPERATING COMPANY, LLC	)	CASE NO.
FOR AN ADJUSTMENT OF WATER AND	)	2025-00354
SEWAGE RATES	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY, BY AND
THROUGH THE OFFICE OF RATE INTERVENTION

Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (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 September 3, 2026. The Commission directs the Attorney General 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 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

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 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).

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.

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 August 13, 2026 Direct Testimony of John Defever (Defever Direct Testimony), page 5. Provide the basis for the cash working capital adjustment, including all calculations for the proposed adjustment. Provide any supporting calculations in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

2. Refer to the Defever Direct Testimony, page 11. Provide the Bureau of Labor Statistics (BLS) report used to determine the BLS average.

3. Refer to the Defever Direct Testimony, page 13. Given that the past rate case expense regulatory asset would be fully amortized on December 31, 2026, explain whether only one month of the amortization should be re-amortized if the Commission issues a final Order before or on the suspension date, December 7, 2026.

4. Refer to the Defever Direct Testimony, page 18.

a. Explain how an anomaly was determined.

b. Explain why 2025 was not also removed as an outlier, given that there were no write offs in that year.

5. Refer to the Defever Direct Testimony, page 21. Explain how the five utilities were selected for the average group.

6. Refer to the Defever Direct Testimony, Exhibit JD-1. Provide a summary of the impact of each proposed adjustment. Provide this response in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

7. Refer to the Defever Direct Testimony, Exhibit JD-2. Provide a summary of the impact of each proposed adjustment. Provide this response in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

8. Refer to the Defever Direct Testimony generally. Provide the revenue requirement impact of each proposed adjustment.

Justin McNeil RP

Justin McNeil
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DATED **AUG 26 2026**

cc: Parties of Record

Case No. 2025-00354

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