

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 SCOTT COUNTY, KENTUCKY

Scott County, Kentucky (Scott County), 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 Scott County 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 person supervising the preparation of the response on behalf of the entity that 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).

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

Scott County shall make timely amendment to any prior response if Scott County 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 Scott County fails or refuses to furnish all or part of the requested information, Scott County 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, Scott County 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 Michael P. Gorman (Gorman Direct Testimony). Provide Exhibits MPG-1, MPG-2, and MPG-3 in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

2. Refer to the Gorman Direct Testimony, page 8. Explain how non-compliant customers should be charged for permit violations so that compliant customers do not bear the entire revenue requirement allocation.

3. Refer to the Gorman Direct Testimony, page 7, lines 9–11. Explain whether Scott County disagrees with Bluegrass Water Utility Operating Company, LLC’s (Bluegrass Water) residential equivalent units for non-residential customers.

4. Refer to the Gorman Direct Testimony, page 11, lines 2–4. State whether non-residential customers generally have higher “loading” than residential customers.

5. Explain whether Scott County considers a phase-in approach to implementing the increase in rates to be a reasonable possible option in this proceeding. If so, explain what Scott County would consider to be a reasonable length of time for a phase in, for both total length and time in between phases.

6. Refer to the Gorman Direct Testimony, page 9, page 13, and Exhibits MPG-2 and MPG-3. Explain how the recommended revenue allocation takes into account the 20 percent direct assignment of the wastewater revenue requirement proposed by Mr. Gorman.

7. Refer to the Gorman Direct Testimony, Exhibit MPG-3, and page 13. The recommendation made by Mr. Gorman suggests an across-the-board approach to the revenue allocation based on the overall percentage change in revenue. Explain how the proposed revenue allocation in Exhibit MPG-3 accomplishes an across-the-board increase to rates of approximately 92.1 percent.

8. Refer to the Gorman Direct Testimony, Exhibit MPG-2 and Exhibit MPG-3. Explain how the balance of volumetric cost versus fixed cost recovery was considered in the development of the recommended revenue allocation for Delaplain Non-Residential customer class.

Justin McNeil RP

Justin McNeil
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601-8294

DATED **AUG 26 2026**

cc: Parties of Record

Case No. 2025-00354

Service List for Case 2025-00354

* Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Aaron Silas
Central States Water Resources
1650 Des Peres Road
Suite 303
St. Louis, MO 63131

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

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

* Honorable David Edward Spenard
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KY 40202

* Hannah Thompson
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KY 40202

* Joe Pat Covington
Judge/Executive
101 East Main Street
Suite 210
Georgetown, KY 40324

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

* Denotes served by Email

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

* J. Michael West
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Bluegrass Water Utility Operating Company, LLC
655 Maryville Centre Drive, Suite 200
St. Louis, MO 63141

* Bluegrass Water Utility Operating Company, LLC
655 Maryville Centre Drive, Suite 200
St. Louis, MO 63141

* Russ Mitten
Bluegrass Water Utility Operating Company, LLC
655 Maryville Centre Drive, Suite 200
St. Louis, MO 63141

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

* Sreenu Dandamudi
Central States Water Resources
1650 Des Peres Road
Suite 303
St. Louis, MO 63131

* Toland Lacy
Office of the Attorney General
700 Capital Avenue
Frankfort, KY 40601

* Edward T Depp
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KY 40202

* Timothy Mayer
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KY 40202