



*Legal Counsel.*

DINSMORE & SHOHL LLP  
101 S. Fifth St., Suite 2500  
Louisville, KY 40202  
www.dinsmore.com

Edward T. Depp  
(502) 540-2347 (direct) · (502) 585-2207 (fax)  
tip.depp@dinsmore.com

September 15, 2025

**RECEIVED**

**SEP 15 2025**

**PUBLIC SERVICE  
COMMISSION**

**Via Electronic Filing**

Linda C. Bridwell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40601

**Re: *Bernice Coyle Watson Tackett, Complainant v. Bluegrass Water Utility  
Operating Company, LLC, Defendant, Case No. 2025-00148***

Dear Executive Director Bridwell:

Enclosed for electronic filing in the above-captioned matter is Bluegrass Water Utility Operating Company, LLC's Supplemental Responses to Commission Staff's First Request for Information. The certificate of service below certifies that the enclosed was filed electronically today. The filing may be accessed at the Commission's Electronic Filing Center located at <http://psc.ky.gov/efs/efsmain.aspx>.

Thank you, and if you have any questions with respect to this matter, please call me.

Sincerely yours,

**DINSMORE & SHOHL LLP**

*/s/ Edward T. Depp*

Edward T. Depp

**Certification**

I hereby certify that a copy of this filing has been served electronically on the Kentucky Public Service Commission. Additionally, a true and accurate copy of the foregoing was mailed via certified mail, on September 15, 2025 to the following:

Bernice Coyle Watson Tackett  
2029 Longview Drive  
Georgetown, KY 40324

Charles Tackett  
134 Robinson Lane  
Georgetown, KY 40324

Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, a paper copy of this filing has not been transmitted to the Commission.

/s/ Edward T. Depp  
*Counsel to Bluegrass Water Utility Operating  
Company, LLC*

ETD/hdt

Enclosures

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC’S  
SUPPLEMENTAL RESPONSES TO COMMISSION STAFF’S REQUEST FOR  
INFORMATION**

Bluegrass Water Utility Operating Company, LLC (“Bluegrass Water” or the “Company”), by counsel, and pursuant to the July 21, 2025 Order (“Order”) of the Kentucky Public Service Commission in this matter, files its supplemental responses to Commission Staff’s First Request for Information to Bluegrass Water.

**FILED: September 15, 2025**

BERNICE COYLE WATSON TACKETT v. BLUEGRASS WATER UTILITY  
OPERATING COMPANY  
CASE NO. 2025-00148

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S SUPPLEMENTAL  
RESPONSES TO THE COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

**REQUEST NO. 1-3: Provide Bluegrass Water's regular sewer maintenance schedule for the Longview WWTP, specifically include and denote the sanitary sewer line along Longview Drive (affected sewer line).**

- a. Provide a detailed explanation of how the maintenance schedule was created and who approved the provided schedule.**
- b. Describe in detail the steps taken and items inspected, as well as any forms designed to document the scheduled maintenance. If forms are to be filled out, provide a copy of an example of each required form.**
- c. Provide the maintenance log and inspection records for the affected sewer line from January 29, 2019, to date.**

**ORIGINAL RESPONSE:** Bluegrass Water has implemented a routine maintenance protocol for the Longview Wastewater Treatment Plant (WWTP) and its sanitary sewer lines, including the one located along Longview Drive (the "affected sewer line"). Bluegrass Water does not have a written schedule because all maintenance activities are scheduled, assigned, and documented through Elements, Bluegrass Water's digital asset management system. 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

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Drive area at least once annually, consistent with Commission regulations. In addition, Bluegrass Water is able to monitor the mechanical equipment on the Longview WWTP system in real-time with data obtained from the remote monitoring equipment ("RME"), as authorized by the Commission in Case No. 2022-00216.

a. The maintenance protocol was developed through collaboration between Bluegrass Water's Operations Team and Asset Management Team. In establishing the protocol, the Company considered historical system performance data, manufacturer recommendations for equipment, applicable regulatory requirements, and system-specific environmental and operational risk factors. The completed schedule is reviewed and approved by senior operations leadership to ensure it aligns with internal best practices and complies with public health and environmental protection standards.

b. Maintenance activities follow a structured process designed to ensure the proper functioning of the wastewater system and to prevent unplanned service disruptions. Each scheduled maintenance visit to the WWTP and the affected sewer line involves detailed inspections and servicing of key infrastructure components, including lift stations, pumps, valves, grinders, aeration systems, clarifiers, and SCADA controls. During these inspections, personnel assess equipment functionality, identify signs of wear or damage, and implement preventative measures to reduce the risk of system failure or sanitary sewer overflows (SSOs). These inspections occur at least once annually.

All inspections follow a standardized checklist to ensure consistency across sites and teams. The inspection process for the WWTP includes verification of mechanical and electrical

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performance, cleanliness, structural integrity, and alarm and control system functionality. Each of these maintenance and inspection activities is documented using Elements, Bluegrass Water's digital asset management system. This system incorporates customized forms for each task, provides automated scheduling for recurring inspections, and enables real-time data entry by field personnel. Recurring maintenance tasks are created and auto-generated in Elements every Sunday for the upcoming week and are assigned directly within the platform to ensure timely completion and proper documentation.

Please see attachments labeled "Exh. DR 1-3b Response," for copies of the standardized checklists followed by field personnel and maintenance forms that are submitted weekly to document the steps taken and items inspected during regularly scheduled maintenance activities.

c. Please see attachment "Exh. DR 1-3c Response - WM\_History – LH," for maintenance log records for the Longview WWTP from January 29, 2019 to date. With respect to the maintenance logs and inspection records for the affected sewer line (as well as the inspection records for the Longview WWTP), Bluegrass Water is currently working to gather this information and will supplement its response to this data request as soon as possible. In March 2025, Bluegrass Water switched from Utility Cloud to Elements as its primary asset management system, which is responsible for logging and storing maintenance and inspection data entered by field personnel. As a result, some of Bluegrass Water's maintenance and inspection records are still contained in Utility Cloud, to which Bluegrass Water no longer has access. Bluegrass Water is currently working with Utility Cloud to obtain the maintenance and inspection records for the affected sewer

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line. Bluegrass Water will supplement this response in the future with all maintenance and inspection records in its possession for the affected sewer line from January 29, 2019 to date.

**SUPPLEMENTAL RESPONSE:** In addition to the foregoing, please see attachment "Exh. DR 1-3c Supplemental Response - WM\_History – LH," for all available maintenance log and inspection records for the Longview WWTP. The first tab of the attachment, labeled "LH – Work Order Log," contains all maintenance log records for the Longview WWTP from January 29, 2019 to date. The second tab of the attachment, labeled "LH - Work Order Records," contains inspection records for the Longview WWTP system. The records in the attachment represent all maintenance and inspection records presently available to Bluegrass Water, in light of its recent efforts to work with Utility Cloud to recover all records previously stored in that platform.

**Witness:      Todd Thomas, Sr. Vice President, Bluegrass Water Utility Operating Company**

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**REQUEST NO. 1-4: Provide a copy of the records for all Sanitary Sewer Overflows (SSOs) occurring from the affected sewer line since January 29, 2019, with the date, the name company doing the repair/maintenance work, what occurred, and what was done to remedy the problem including any cleanup and damages paid, including the overflow that is the subject of this Complaint.**

**ORIGINAL RESPONSE:** Bluegrass Water and its third-party operations and maintenance firm, Clearwater Solutions, have observed only one Sanitary Sewer Overflow (SSO) in connection with the Longview WWTP, including the affected sewer line. The event occurred on April 4, 2025, when sewage was observed coming up from a manhole. Clearwater Solutions promptly responded the day of this event to ensure the SSO was properly cleaned up, and the incident was properly reported to the Division of Water. Bluegrass Water is not aware of any damages resulting from the SSO that occurred on April 4, 2025, and therefore, no payments for damages have been made.

With respect to the incident referenced in the Complaint, Bluegrass Water received a report of a possible basement backup and promptly dispatched field crews to investigate. Upon arrival, personnel attempted to make contact with the resident; however, no one answered the door, and no SSO or evidence of an overflow was observed in the collection system at that time.

As a precautionary measure, Clearwater Solutions engaged a third-party contractor, Buchanan, to conduct a televised inspection (CCTV) of the affected gravity sewer line. The



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inspection confirmed that the line was flowing properly and that no blockage was present at the time of inspections. While tree roots were observed within the line, there was no indication of an active obstruction. Notably, the continuous operations of the camera through the inspection confirmed the absence of any SSO, as the equipment would have become submerged and non-functional had a full blockage been present. Because no overflow was directly observed by Bluegrass Water or its contractors, and no evidence of an SSO was found within the system, Bluegrass Water did not report an SSO for the event that is the subject of this Complaint.

Accordingly, only one SSO has been reported for the Longview WWTP system since January 29, 2019. Bluegrass Water is in the process of obtaining a copy of the report for this SSO and will supplement its response upon receipt of that documentation.

**SUPPLEMENTAL RESPONSE:** Upon further investigation, Bluegrass Water and its third-party operations and maintenance firm, Clearwater Solutions, have observed a total of five Sanitary Sewer Overflows (SSO) in connection with the Longview WWTP since Bluegrass Water acquired the system in 2019. In addition to the SSO described above, which occurred on April 4, 2025, there were four SSOs that occurred in 2020 and 2021 at the Longview WWTP, and not the affected sewer line. Please see the attachments labeled "Exh. DR 1-4 Supplemental Response – SSO Incident Reports," which are copies of four of the incident reports filed with the Energy and Environment Cabinet, Division of Water. As demonstrated in the reports, Bluegrass Water promptly addressed and reported the SSOs consistent with Kentucky regulations. Bluegrass Water is not aware of any damages resulting from these SSOs and therefore, no payments were made.

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**Witness:**      **Todd Thomas, Sr. Vice President, Bluegrass Water Utility Operating  
Company**

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

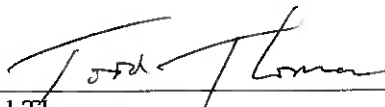
In the Matter of:

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

**BLUEGRASS WATER'S RESPONSES TO COMMISSION STAFF'S  
REQUEST FOR INFORMATION**

**VERIFICATION**

I, Todd Thomas, verify, state, and affirm that the Responses to Commission Staff's Request for Information filed with this verification, is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
Todd Thomas  
Senior Vice President  
Bluegrass Water Utility Operating Company, LLC

STATE OF MISSOURI )  
 ) ss:  
COUNTY OF ST. LOUIS )

SUBSCRIBED AND SWORN TO before me by Todd Thomas on this the 5<sup>th</sup> day of September, 2025.

My commission expires: April 10, 2027

  
Notary Public

ROSHAWNE VALLANDINGHAM  
Notary Public - Notary Seal  
Jefferson County - State of Missouri  
Commission Number 23414639  
My Commission Expires Apr 10, 2027

**INCIDENT REPORT**

Incident:2464055

**Incident Description**

**Incident Type:** OVERFLOW - COMBINED SEWER OVERFLOW WET WEATHER  
**Incident Date:** 12/16/2019 17:00:00  
**Parish:** Scott  
**Municipality:** Georgetown (Scott)  
**Location:** LH treatment Plant

**Lat/Lon:** 38.213388 / -84.663159  
**Basin/Segment:**  
**Substance(s):**  
**Media Impacted:** Surface Water  
**Incident Desc:** Nature of Incident: Sanitary Sewer Overflow Cause/Duration of Incident: Heavy rain/ approximately 15.5 hrs Actions Taken: clean up area Release To: Stream Receiving into an unnamed tributary? No.

**Incident Status**

**Lead Investigator:** Robert Daniell  
**Incident Region:**  
**Incident Status:** Env. Closed  
**Followup Status:**  
**As Of:**

**Incident Reporter 1**

**Received By:** Robert Daniell  
**Received Date:** 12/17/2019 15:56:00  
**Dispatch Number(s):** 78455  
**Reported By:** Joe Arnold  
**Phone:** 502-370-7015 (Work phone number)  
**Reporter Title:**  
**Organization:** LH WWTP  
**Address:** Frankfort Pike

**Municipality:** Georgetown (Scott)  
**State:** KY  
**Zip Code:** 40324  
**Comments:** eNotification Request ID# = 78455

**INCIDENT REPORT**

Incident:2464055

**Incident Source 1**

**Source Name:** LH WWTP

**Address:** Frankfort Pike

**Municipality:** Georgetown (Scott)

**State:** KY

**Phone:**

**Parish:** Scott

**AI #:** 163895

**Related Permits:**

**Comments:**

**INCIDENT REPORT**

Incident:2464755

**Incident Description**

**Incident Type:** OVERFLOW - COMBINED SEWER OVERFLOW WET WEATHER  
**Incident Date:** 01/12/2020 00:00:00  
**Parish:** Scott  
**Municipality:** Georgetown (Scott)  
**Location:** LH Wastewater Facility  
  
**Lat/Lon:** 38.213388 / -84.663159  
**Basin/Segment:**  
**Substance(s):**  
**Media Impacted:** Surface Water  
**Incident Desc:** Nature of Incident: Sewer overflow Cause/Duration of Incident: Combination of rain & surge pumps alternating relay had gone bad. Actions Taken: Will replace relay ASAP Release To: Ditch Receiving into an unnamed tributary? No.

**Incident Status**

**Lead Investigator:** Robert Daniell  
**Incident Region:**  
**Incident Status:** Env. Closed  
**Followup Status:**  
**As Of:**

**Incident Reporter 1**

**Received By:** Robert Daniell  
**Received Date:** 01/12/2020 18:24:00  
**Dispatch Number(s):** 79058  
**Reported By:** Joe Arnold  
**Phone:** 502-370-7015 (Work phone number)  
**Reporter Title:**  
**Organization:** LH WWTP  
**Address:** Frankfort Pike  
  
**Municipality:** Georgetown (Scott)  
**State:** KY  
**Zip Code:** 40324  
**Comments:** eNotification Request ID# = 79058

**INCIDENT REPORT**

Incident:2464755

**Incident Source 1**

**Source Name:** LH WWTP

**Address:** Frankfort Pike

**Municipality:** Georgetown (Scott)

**State:** KY

**Phone:**

**Parish:** Scott

**AI #:** 163895

**Related Permits:**

**Comments:**

**INCIDENT REPORT**

Incident:2476938

**Incident Description**

**Incident Type:** OVERFLOW - COMBINED SEWER OVERFLOW WET WEATHER  
**Incident Date:** 01/01/2021 11:30:00  
**Parish:** Scott  
**Municipality:** Georgetown (Scott)  
**Location:** At the plant  
  
**Lat/Lon:** 38.213388 / -84.663159  
**Basin/Segment:**  
**Substance(s):**  
**Media Impacted:** Surface Water  
**Incident Desc:** Nature of Incident: Sewer overflow Cause/Duration of Incident: 2-1/2" rain 24hrs. Actions Taken: Cleaned up area Release To: Lake Receiving into an unnamed tributary? No.

**Incident Status**

**Lead Investigator:** Jarod Jones  
**Incident Region:**  
**Incident Status:** Env. Closed  
**Followup Status:**  
**As Of:**

**Incident Reporter 1**

**Received By:** Jarod Jones  
**Received Date:** 01/04/2021 08:18:00  
**Dispatch Number(s):** 86087  
**Reported By:** Joe Arnold  
**Phone:** 502-370-7015 (Work phone number)  
**Reporter Title:**  
**Organization:** LH WWTP  
**Address:** Frankfort Pike  
  
**Municipality:** Georgetown (Scott)  
**State:** KY  
**Zip Code:** 40324  
**Comments:** eNotification Request ID# = 86087



**INCIDENT REPORT**

Incident:2476938

**Incident Source 1**

**Source Name:** LH WWTP

**Address:** Frankfort Pike

**Municipality:** Georgetown (Scott)

**State:** KY

**Phone:**

**Parish:** Scott

**AI #:** 163895

**Related Permits:**

**Comments:**

**INCIDENT REPORT**

Incident:2477790

**Incident Description**

**Incident Type:** OVERFLOW - COMBINED SEWER OVERFLOW WET WEATHER  
**Incident Date:** 01/26/2021 01:00:00  
**Parish:** Scott  
**Municipality:** Georgetown (Scott)  
**Location:** At the plant  
  
**Lat/Lon:** 38.213388 / -84.663159  
**Basin/Segment:**  
**Substance(s):** Sewage  
  
**Media Impacted:** Surface Water  
**Incident Desc:** Nature of Incident: Sewer overflow Cause/Duration of Incident: 2- 1/4 inches of rain. Approximately 5 hrs. Actions Taken: Cleaned up area Release To: Stream Receiving into an unnamed tributary? No.

**Incident Status**

**Lead Investigator:** Jarod Jones  
**Incident Region:**  
**Incident Status:** Env. Closed  
**Followup Status:**  
**As Of:**

**Incident Reporter 1**

**Received By:** Jarod Jones  
**Received Date:** 01/26/2021 13:17:00  
**Dispatch Number(s):** 86677  
**Reported By:** Joe Arnold  
**Phone:** 502-370-7015 (Work phone number)  
**Reporter Title:**  
**Organization:** LH WWTP  
**Address:** Frankfort Pike  
  
**Municipality:** Georgetown (Scott)  
**State:** KY  
**Zip Code:** 40324  
**Comments:** eNotification Request ID# = 86677

**INCIDENT REPORT**

Incident:2477790

**Incident Source 1**

**Source Name:** LH WWTP

**Address:** Frankfort Pike

**Municipality:** Georgetown (Scott)

**State:** KY

**Phone:**

**Parish:** Scott

**AI #:** 163895

**Related Permits:**

**Comments:**