

RECEIVED

OCT 16 2025

PUBLIC SERVICE
COMMISSION

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

Dinsmôre

October 16, 2025

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 Responses to Commission Staff's Second 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

Executive Director Bridwell

October 16, 2025

Page 2 of 2

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 October 16, 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
RESPONSES TO COMMISSION STAFF’S SECOND REQUEST FOR INFORMATION**

Bluegrass Water Utility Operating Company, LLC (“Bluegrass Water” or the “Company”), by counsel, and pursuant to the September 30, 2025 Order (“Order”) of the Kentucky Public Service Commission in this matter, files its responses to Commission Staff’s Second Request for Information to Bluegrass Water.

FILED: October 16, 2025

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

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

REQUEST NO. 2-1: 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 main, 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.

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

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

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.**

RESPONSE:

a. The 8-inch Vitrified Clay Pipe shown in the referenced video is part of the sewer main owned and operated by Bluegrass Water.

b. The affected sewer main shown in the March 21, 2025 video was most recently inspected on March 1, 2025. The affected sewer line was inspected by Clearwater Solutions (Bluegrass Water's third-party operations and maintenance contractor) as part of Bluegrass Water's routine Collection System Preventative Maintenance Checklist, which involves a comprehensive inspection of the collection system to check for overflows, exposed pipes, manhole conditions, and alarm status, to ensure that the system is functioning properly. The attachment labeled "Exh. DR 2-1(b) Response – Utility Cloud WO – 3.1.25.xlsx" reflects the exported data of this March 1 inspection from Utility Cloud (Bluegrass Water's former primary asset management system).

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

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

c. The March 1, 2025 inspection was performed by Charles Begley and Josh Duncan of Clearwater Solutions, Bluegrass Water's third-party operations and maintenance contractor.

d. There was no video taken during the March 1, 2025 inspection; rather, this routine inspection consists of a visual inspection of the collection system to check for overflows, exposed piping, manhole conditions, and alarm status.

e. During the Collection System Preventative Maintenance Checklist conducted on March 1, 2025, Clearwater Solutions did not observe any abnormal conditions, including, but not limited to, any root intrusions. For work orders such as the Collection System Preventative Maintenance Checklist, the Utility Cloud interface prompted operators to note whether the collection system "passed" or "failed" the inspection. Clearwater Solutions indicated that the collection system "passed" inspection on this date. *See also* "Exh. DR 2-1(b) Response – Utility Cloud WO – 3.1.25.xlsx."

f. Because the collection system passed the March 1, 2025 inspection, no additional work was required.

g. Bluegrass Water cannot conclusively determine the age of the root systems observed in the March 21, 2025 video.

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

In the Matter of:

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